

## **EXHIBIT C**

OWEN v. JAVED, et al.  
DEPOSITION OF: CHRISTY LENHARDT

No. 18 CV 334  
February 1, 2022

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1           IN THE UNITED STATES DISTRICT COURT  
2           NORTHERN DISTRICT OF ILLINOIS  
3           EASTERN DIVISION

4           MARK OWENS,   )  
5   )  
6   )  
7   )  
8   )  
9   )  
10                  vs.   ) No. 18-cv-334  
11   )  
12                  HASINA JAVED,                                     )  
13   )  
14   )  
15   )  
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24   )

The deposition of CHRISTY LENHARDT  
called by the Defendants for examination, taken  
pursuant to the Federal Rules of Civil Procedure  
for the United States District Courts pertaining  
to the taking of depositions, taken before Gay  
Dall, CSR and RPR, via Zoom on the 1st day of  
February, 2022, at 9:15 a.m.

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1 A P P E A R A N C E S:

2

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16 on behalf of Benahdam Hurt  
17 and Mark Owens;

18

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21

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1 APPEARANCES: (Continued)

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Colleen Delaney, Diana Hogan (Hurt);

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21 Appeared on behalf of Drew Beck (Hurt);

22

23

24

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1 APPEARANCES: (Continued)

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11 (Hurt);

12

13 STEVEN J. BRODY & ASSOCIATES

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17 (815)374-7783

18 BY: Mr. Steven J. Brody  
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19 on behalf of the witness, Christy Lenhardt;

20

21 ALSO PRESENT:

22 Mr. Rory Cannon, Illinois Department of  
Health and

23 Mr. Sean Gunderson.

24

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3	THE WITNESS:	PAGE
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1                     (The witness was duly sworn.)

2                     CHRISTY LENHARDT,

3                     being first duly sworn to testify to the  
4                     truth and nothing but the truth, was examined  
5                     and testified as follows:

6                     DIRECT EXAMINATION

7                     BY MS. JOHNSTON:

8                     Q. First of all, Mr. Lenhardt, can you  
9                     please state and spell your name on the record.

10                    A. Christy Lenhardt, C-H-R-I-S-T-Y,  
11                     L-E-N-H-A-R-D-T.

12                    MS. JOHNSTON: And if we want to,  
13                     everybody can hit their cameras off, if they're  
14                     so inclined. Shall we get everybody else's  
15                     appearances on the record quickly.

16                    MR. BRODY: Steven Brody, attorney  
17                     for Christy Lenhardt.

18                    MR. CECALA: Joseph Cecala,  
19                     C-E-C-A-L-A, attorney for Mark Owens and Ben  
20                     Hurt.

21                    MR. KRETCHMAR: S. Randolph  
22                     Kretchmar. That's first initial S, as in  
23                     Stuart, R-A-N-D-O-L-P-H, K-R-E-T-C-H-M-A-R,  
24                     also attorney for Ben Hurt and Mark Owens.

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1 MS. JOHNSTON: Mary Johnston,  
2 J-O-H-N-S-T-O-N, attorney for defendants,  
3 Javed, Kareemi, Delaney and Hogan in the Hurt  
4 matter, and attorney for defendant Javed in the  
5 Owens case.

6 MS. KOZAR: Amanda Kozar, attorney  
7 for the defendant, Drew Beck, in the Hurt case.

8 MS. NEWMAN: Sarah Newman attorney  
9 for defendants, Javed, Kareemi, Hogan and  
10 Delaney in the Hurt case.

11 And before we all mute, if I could  
12 ask, could we please don't forget to swear in  
13 the witness.

14 THE STENOGRAPHER: I swore her in  
15 already.

16 MS. NEWMAN: I didn't hear that  
17 part. Sorry.

18 MS. JOHNSTON: And then Rory and  
19 Sean, did you want to put your appearances on.

20 MR. CANNON: Sure. Rory Cannon,  
21 assistant general counsel, Illinois Department  
22 of Human Services.

23 MR. CECALA: Sean, you can just  
24 give her your information as our paralegal.

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1 MR. GUNDERSON: Yes. Sean

2 Gunderson, paralegal for Ketchmar and Cecala  
3 Law Firm.

4 BY MS. JOHNSTON:

5 Q. Okay. We're going to go ahead and  
6 get started, but before I get into any  
7 questions, I'm just going to go over a couple  
8 of ground rules with you, Ms. Lenhardt.

9 Have you ever been deposed before?

10 A. No.

11 Q. Okay. So these are just a couple  
12 of ground rules to make it a little bit easier  
13 so that we can get a clean record.

14 As you can see, Gay here is a court  
15 reporter, so we need her to be able to take  
16 down everything we're saying accurately.

17 So the first is to make sure that  
18 you use verbal answers. So yeses and nos, as  
19 opposed to uh-huhs, huh-huhs or you know,  
20 nodding and shaking of the head.

21 Then please wait for myself or  
22 whoever is asking the questions to fully finish  
23 their question before you start answering. And  
24 I will do the same, and let you fully finish

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1       your answer before I move on to the next  
2       question. That just helps avoid having any  
3       issues with the record once we get the  
4       transcript back.

5                  We can take breaks, if you need to,  
6       but I do ask that if you need to take a break  
7       for any reason, if I've asked a question, just  
8       make sure you answer that question before we  
9       take the break.

10                 And if you don't understand one of  
11       the questions that I ask, tell me. If you  
12       answer a question, we are going to assume that  
13       you understood what was being asked, and that  
14       you answered as you intended to. So if you're  
15       unsure about something, let me know, and I will  
16       rephrase it to make sure that you know what I'm  
17       asking.

18                 Do you understand that right now  
19       you are under oath and required to tell the  
20       truth?

21                 **A. Yes.**

22                 Q. Okay. And I ask this of everybody,  
23       but is there any reason that you cannot testify  
24       truthfully today?

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1           **A. No.**

2           Q. You're not on any medications that  
3 would impact your ability to tell the truth?

4           **A. No.**

5           Q. Or any medications that would  
6 impact your ability to remember, you know, the  
7 recent past?

8           **A. No.**

9           Q. Okay.

10           MR. CECALA: One other ground rule,  
11 Christy. If Steven or Randy or I make an  
12 objection, just -- the court reporter can't  
13 take down two people talking at the same time.

14           THE WITNESS: Okay.

15           MR. CECALA: You want to let the  
16 person objecting finish. Same as the question,  
17 let everyone finish saying what they're saying  
18 before you start your answer or get an  
19 instruction from Steven or whatever the case  
20 may be. You just want to make sure that the  
21 record -- the court reporter can't take down  
22 two people talking at the same time. So if  
23 we're talking as well, and there's an  
24 objection, just wait until they finish the

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1 objection, and then you give your answer.

2 Okay?

3 THE WITNESS: Okay.

4 MS. NEWMAN: And before we begin, I  
5 just -- I have a question. You said Sean  
6 Gunderson is your paralegal. Is this the same  
7 Sean Gunderson that has at least one lawsuit  
8 pending against various defendants at Elgin  
9 Mental Health Center?

10 MR. CECALA: He does.

11 MS. NEWMAN: Does he have any  
12 lawsuits pending against the defendants in this  
13 case?

14 MR. CECALA: No.

15 MS. NEWMAN: We're just concerned  
16 that that represents of a bit of a conflict for  
17 him because he is a, you know --

18 MS. JOHNSTON: Yeah.

19 MS. NEWMAN: Yeah. I'm afraid I do  
20 kind of have to object to having him present  
21 during the deposition, given his personal --

22 MR. CECALA: Noted. He's been our  
23 paralegal before his claim against the --  
24 against other defendants. So noted.

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1                   We believe Rory has a conflict of  
2 interest as well. But we went on the record  
3 last time asserting that, you know, someone  
4 who's not participating, but is listening --  
5 and he's an employee. So he is a valuable  
6 paralegal in these cases to us. And he has  
7 been working on this case long before he had  
8 his own suit against the other defendants. So  
9 he's not here for some nefarious reasons. He's  
10 here because he does paralegal work on this  
11 case.

12                  MS. JOHNSTON: The objection is  
13 noted on the record, and we'll move forward  
14 with the deposition.

15 BY MS. JOHNSTON:

16 Q. And so, Ms. Lenhardt, sorry about  
17 that.

18                  I'm going to just get a little bit  
19 of a personal background from you. First, what  
20 is your date of birth?

21 A. [REDACTED]

22 Q. And where did you grow up?

23 A. **Melrose Park and Addison and Elk**  
24 **Grove Village.**

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1 Q. And what is the highest level of  
2 education that you've completed?

3 A. **Master's degree in social work.**

4 Q. Okay. Let's backtrack there.

5 Where did you go to college?

6 A. **University of Illinois at Chicago.**

7 Q. UIC?

8 A. **Uh-huh.**

9 MR. BRODY: You have to answer --  
10 excuse me. You have to answer yes or no  
11 verbally and loud enough. "Uh-huh" is  
12 something that the court reporter can't take  
13 down.

14 THE WITNESS: Oh, okay.

15 MS. JOHNSTON: It's a very common  
16 thing to do, so don't feel bad if any of us  
17 mention it again. It takes a while to get used  
18 to.

19 BY MS. JOHNSTON:

20 Q. When did you graduate from UIC?

21 A. **1987.**

22 Q. What was your degree in?

23 A. **Social work.**

24 Q. And you stated you received a

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1 master's?

2           **A. Yes.**

3           Q. Where did you obtain that master's  
4 degree?

5           **A. University of Illinois at Chicago.**

6           Q. And was that a master's in social  
7 work?

8           **A. Yes.**

9           Q. When did you get that master's  
10 degree?

11          **A. In '87.**

12          Q. At the same time you were doing  
13 both programs kind of concurrently?

14          **A. What do you mean "both programs"?**

15          Q. Well, you said that you graduated  
16 from UIC. Was that undergrad that you  
17 graduated in 1987?

18          **A. That was my master's degree.**

19          Q. Okay. When did you graduate from  
20 undergrad?

21          **A. I'm sorry. I didn't realize the  
22 difference in the questions. I graduated with  
23 my undergraduate degree in 1986.**

24          Q. So then you went straight into that

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1 master's in social work program?

2           **A. Correct.**

3           Q. And then did you become a social  
4           worker in 1987?

5           **A. Yes.**

6           Q. And what was your first job as a  
7           social worker?

8           **A. I was a social worker at Allendale  
9           in Waukegan.**

10          Q. Did you say Allendale, like, A-L --

11          **A. Allendale, uh-huh.**

12          Q. Okay.

13           MR. BRODY: You did it again with  
14           the uh-huh.

15           THE WITNESS: Sorry.

16           MR. BRODY: That's all right.

17           Relax. You're fine.

18           BY MS. JOHNSTON:

19          Q. Allendale in Waukegan. And when  
20          did you start at Allendale?

21          **A. I need to look at my resume.**

22          **Sometime in 1987.**

23          Q. And how long were you there?

24          **A. I'm not sure these answers are**

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1       going to be completely correct. I didn't  
2       expect these kind of questions to be answered.  
3       I haven't reviewed my resume. This is 30 --  
4       20-something years ago.

5           Q.     That's okay.

6           Roughly, how long were you there?

7           A.     A year and a half.

8           Q.     And what did you -- what kind of  
9       facility is Allendale?

10          A.     I worked in one of their group  
11       homes for emotionally disturbed boys.

12          Q.     And after leaving Allendale roughly  
13       sometime in 1989 or maybe 1990, again,  
14       that's -- I understand this is a long time  
15       ago -- where did you work next?

16          A.     Jane Addams School of Social Work.

17          Q.     And what did you do there?

18          A.     I was the social worker. I did  
19       therapy with the students who were emotionally  
20       disturbed.

21          Q.     And, roughly, how long were you at  
22       the Jane Addams School of Social Work?

23          A.     Two years; maybe, two and a half.

24          Q.     And after Jane Addams?

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1           A. I worked at -- I'm sorry. I worked  
2           at -- I can't remember. It was on Irving Park  
3           Road. I wish you told me, I would have brought  
4           my resume. At the moment, I can't remember the  
5           name. We could go back.

6           Q. That's okay.

7           A. Oh, Streamwood. Streamwood  
8           Behavioral Health.

9           Q. And do you have a rough time frame  
10          for how long you were at Streamwood?

11          A. A couple of years, two or three  
12          years.

13          Q. And after Streamwood, where did you  
14          work?

15          A. I went into independent contract  
16          work. I worked with the Institute for Stress  
17          Management.

18          Q. Where is that located?

19          A. They were -- they're no longer.  
20          They were located in Hoffman Estates.

21          Q. And do you have an estimate as to  
22          how long you were doing that independent  
23          contract work with them?

24          A. It was during my pregnancy with my

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1       oldest son. And he was born in -- was about  
2       six months old. So 1990 -- nineteen -- he was  
3       born in February. 1994.

4                   MR. BRODY: Speak up a little bit.

5                   THE WITNESS: Okay.

6       BY MS. JOHNSTON:

7       Q. And after that, where did you work  
8       next?

9       A. **Lifecore.**

10      Q. Is that, again, as a social worker?

11      A. **Yes.**

12      Q. Okay. What kind of business or  
13     company is that?

14      A. They worked -- Dr. Delosantos  
15     (photonically) had patients at various group  
16     homes -- not group homes -- nursing homes, and  
17     I went in and did mental statuses on the  
18     patients and assigned them to groups and did  
19     the groups.

20      Q. And do you have an estimate as to  
21     how long you were at Lifecore?

22      A. **I guess another two years.**

23      Q. And where did you go after you were  
24     at Lifecore?

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1           **A. Elgin Mental Health Center.**

2           Q. Okay. And do you remember when you  
3        started at Elgin?

4           **A. I used to -- I worked there 20**  
5        **years and that ended in 2017.**

6           Q. All right. So probably somewhere  
7        around 1997 or so?

8           **A. Yeah.**

9           Q. Okay. And so you started at Elgin  
10       in roughly 1997, and I understand that we're  
11       giving that as an estimated date for right now.

12           So when you started at Elgin, what  
13       was your job title?

14           **A. Social worker on the civil side.**

15           Q. You say the "civil side," can you  
16       explain what that means?

17           **A. Where patients from the community**  
18       **are hospitalized, psychiatrically hospitalized.**

19           Q. And when you say "From the  
20       community," is that different -- well, you  
21       mentioned the civil side. What is the other  
22       side of Elgin?

23           **A. Forensics.**

24           Q. And is that where the patients who

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1       are required to be there --

2           **A. Court ordered, yes.**

3           Q. So the individuals on the civil  
4       side, are those individuals who have  
5       voluntarily entered the Elgin Mental Health  
6       Center?

7           **A. Some of them. Some of them were on  
8       petitions.**

9           Q. Okay. And do you remember what  
10      unit that would have been called, or was it  
11      called something completely different?

12           **A. I'm nervous, so I can't remember  
13       stuff. Kate Lee. Kate Lee.**

14           Q. Kate Lee?

15           **A. Yes. Kate is a person. Kate,  
16       K-A-T-E, Lee, L-E-E.**

17           Q. Okay. And --

18           **A. Then I switched over to one that  
19       started with a W. And the one that started  
20       with a W, I cannot recall the name at this  
21       moment.**

22           Q. Was that unit with a W also on the  
23       civil side?

24           **A. Yes.**

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1           Q.    Okay.  And what were your  
2        responsibilities while you were working at the  
3        Kate Lee unit and the W unit?

4           A.    Whittman.  Whittman.  That was the  
5        name.  W-H-I-T-T-M-A-N, I believe.

6           So my responsibilities were to  
7        admit people.  I did the admission paperwork,  
8        did their social assessments, wrote their  
9        treatment plans, did their counseling,  
10       attended, and -- I don't think I led them, but  
11       attended their treatment plan meetings once a  
12       month.  Discharged them.  Helped them develop a  
13       relapse prevention.  I'm sorry.  Developed  
14       their discharge plan for where they were going  
15       to go live after their discharge, and where  
16       they were going to get their treatment.

17           Q.    And what was the make up of -- the  
18        demographic of the patients on these units;  
19        meaning, was it co-ed, all men, all woman?

20           A.    It was co-ed.  One side was the  
21        men, and one side had the women.  And one  
22        hallway had the men and one hallway had the  
23        women with, I think, a nurse's station in  
24        between.

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1                   **They were age 21 and over. No.**

2       **18. I think when they were 18, they could be**  
3       **hospitalized there.**

4       Q.     Okay. So you were at the -- call  
5       it the -- whatever you said.

6       **A.     The Kate Lee.**

7       Q.     The Kate Lee and the Whittman units  
8       on the civil side. And it sounds like it  
9       was -- a lot of the work that you were doing  
10      there overlapping the same general stuff just  
11      on two different units?

12      **A.     Yes, they were both exactly the**  
13      **same.**

14      Q.     Okay. And how long were you on the  
15      civil side?

16      **A.     Eight years.**

17      Q.     And so that's putting us until  
18      approximately 2005 give or take?

19      **A.     Yes.**

20      Q.     And where did you go then in 2005?

21      **A.     To the forensics side of the**  
22      **hospital. The forensic psychiatric units.**

23      Q.     And which unit were you first  
24      assigned to on the forensic side?

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1           **A. M. They were all letters. M,**  
2           **like, Mary.**

3           Q. Okay. And what was the make up of  
4           that unit? Was it co-ed? Is it all men, all  
5           women?

6           **A. Just all men. Wait. Yeah, all**  
7           **men. Sorry.**

8           Q. And how long were you on the M  
9           unit?

10          **A. Maybe four years. Three.**

11          Q. Do you know why it is that you were  
12         transferred from the civil side to the  
13         psychiatric side?

14          **A. I asked for it.**

15          Q. Why did you request that transfer?

16          **A. I applied. Sorry. Because the pay**  
17         **was higher on the forensic side, and I was**  
18         **interested in changing my work up.**

19          Q. You said changing your work up,  
20         meaning just kind of switching what it --

21          **A. Yeah.**

22          Q. -- was you were doing?

23          **A. Yeah.**

24          Q. Okay. So you were on the M Unit

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1 for about four years until, roughly, 2009. And  
2 where did you go after being on the M Unit?

3 **A. To the L Unit.**

4 Q. Okay. And do you know why you were  
5 transferred from M to L?

6 **A. They were concerned about my  
7 boundaries with patients.**

8 Q. And did they tell you that?

9 **A. Yes.**

10 Q. Before you were transferred?

11 **A. Yes.**

12 Q. What did they say about their  
13 concerns?

14 **A. I don't know if a lot was said,  
15 just that I was being transferred.**

16 Q. Who told you that?

17 **A. Jeff Pharis.**

18 Q. And you said -- well, tell me what  
19 you do remember that was said.

20 **A. So you're going to find that I  
21 don't remember a lot about conversations. It's  
22 just not the way my brain works. I remember  
23 there was tension. I remember he wanted me to  
24 transfer, and at some point, he just wanted me**

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1           **to get my things and go to the other unit.**

2           Q.     And I understand that you're saying  
3           that -- you know, specifics of conversations is  
4           not your strong suit it sounds like, but I will  
5           be needing to ask you for anything that you do  
6           remember that is important on my end.

7           So it was in conversation with Jeff  
8           Pharis where you were told that you were going  
9           to be transferred?

10          **A.     Correct.**

11          Q.     Was anybody else in the room?

12          **A.     No. It was -- if I remember**  
13           **correctly, it was in the dayroom and nobody was**  
14           **there.**

15          Q.     And, again, he -- do you remember  
16           him giving you a specific reason for being  
17           transferred?

18          **A.     No.**

19          Q.     He did not say anything specific as  
20           to why it was you were being transferred?

21          **A.     If I were -- if I'm to speak**  
22           **truthfully, I would not be able to remember**  
23           **exactly what he said.**

24          Q.     But you thought it was because of

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1 boundary issues?

2           **A. Yeah.**

3           Q. What makes you think that?

4           **A. It may have been after an incident**  
5           **in which I was with that patient, and it --**

6           Q. I'm going to ask, what patient?

7           MR. BRODY: You can say the name of  
8 the patient.

9           THE WITNESS: [REDACTED] [REDACTED]

10          BY MS. JOHNSTON:

11          Q. And I'm sorry that I interrupted  
12 you there. I just wanted to make sure I was  
13 aware of who we were discussing.

14          So you said it may have been after  
15 an incident with [REDACTED] and I apologize  
16 for --

17          MR. BRODY: I'm going to object to  
18 that. You're misconstruing what she said,  
19 after an incident. She said after -- I think  
20 she said after she was -- did you use the word  
21 incident, or did you use another word?

22          THE WITNESS: I used the word  
23 incident.

24          MR. BRODY: Oh, never mind. She

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1 used the word incident.

2 MS. JOHNSTON: No problem.

3 BY MS. JOHNSTON:

4 Q. Okay. I'm so sorry about that,  
5 Ms. Lenhardt, if you could continue with what  
6 it was you were discussing.

7 A. **So we were in the activity**  
8 **therapist's office cleaning her office, the**  
9 **three of us, Becky Nikolov, [REDACTED] and myself.**

10 Q. And was there more to that as to  
11 why you think that you would have been  
12 transferred because of having been in a room  
13 with [REDACTED] and another -- I believe Becky  
14 Nikolov was another DHS employee?

15 A. **Yes. Because we were in there**  
16 **after she left, and people -- the STAs and**  
17 **people reported it to whoever they reported it**  
18 **to.**

19 Q. They reported that you were in  
20 Becky Nikolov's office alone with [REDACTED]

21 A. **Yes.**

22 Q. But during your conversation with  
23 Jeff Pharis about being transferred from the  
24 M Unit to the L Unit, he did not -- did he

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1 mention [REDACTED] at any point in time?

2 **A. Yes.**

3 Q. Well, what did he say then?

4 A. I really don't remember exactly  
5 what he said.

6 Q. And previously you had also said  
7 that you didn't remember, but do you remember  
8 that he mentioned [REDACTED] specifically?

9 A. Yes. I knew it was about [REDACTED]

10 Q. Because Jeff Pharis told you?

11 A. Yeah, I guess. I guess.

12 Q. Well, and I'm just wanting to  
13 clarify where we are because previously you had  
14 said that you didn't remember any of the  
15 specifics about what it was that you said  
16 during the conversation. So I just want to  
17 know, was it your thought that it was because  
18 of [REDACTED] just based on your kind of read of  
19 the room, if you will, or was it based on what  
20 Jeff Pharis specifically said to you about why  
21 you were being transferred?

22 A. Yeah, it may have been because of  
23 what he specifically said.

24 Q. But you don't remember what he

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1 specifically said?

2 **A. No, I don't.**

3 Q. Or if he specifically mentioned

4 [REDACTED]

5 A. He must have -- he must have  
6 mentioned [REDACTED]

7 Q. So then you were transferred in --  
8 I think you said it would probably be sometime  
9 in approximately 2009, that you were  
10 transferred to the L Unit?

11 A. Think it was 2005. I think you  
12 said 2005.

13 Q. Well, I think 2005 was when you  
14 went from the civil side to the forensic side.

15 A. Oh, you're right. You're right.  
16 You're right. Yeah, it would have been about  
17 2009.

18 Q. Okay. And, again, I understand  
19 we're working with some approximations here  
20 kind of just to help us keep track of the  
21 narrative. We would obviously be able to  
22 confirm any of these dates later on, and  
23 that's -- okay. I just want to give us sort of  
24 a timeline that we can work with here.

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1                   So you were transferred to L. And  
2                   how long were you on the L Unit?

3                   **A. To make it eight years, so 1997 is**  
4                   **when I started at Elgin Mental Health Center.**

5                   Q. Okay.

6                   **A. So eight years from then.**

7                   Q. Well, now, we're talking about when  
8                   you were on the L Unit, on the forensics side.

9                   **A. Oh.**

10                  Q. So that's after you had done the  
11                  eight years.

12                  **A. Oh, right, on the civil side. And**  
13                  **then I was on M, and then I was transferred.**

14                  **Okay.**

15                  **So, yeah, it would have been around**  
16                  **2009. I'm sorry.**

17                  Q. And how long were you on the  
18                  L Unit?

19                  **A. For the rest of my stay there.**

20                  Q. Okay. That's the last place that  
21                  you -- the last unit that you were assigned to?

22                  **A. Uh-huh.**

23                  Q. Okay.

24                  **A. Yes.**

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1           Q. And I believe we may have gone over  
2         this, but bear with me. Is the L Unit a co-ed  
3         unit as well, or is it all male, all female?

4           A. All male. On the forensic side  
5         **they did not mix genders.**

6           Q. And on the L Unit, can you give me  
7         a little bit of an idea of what your duties  
8         were there?

9           A. I admitted patients. They would  
10         come from jail to Elgin Mental Health Center  
11         after they were found not guilty by reason of  
12         insanity or unfit to stand trial. We had  
13         the -- the largest portion of our population  
14         was NGRI, not guilty by reason of insanity.

15           I did their admissions. I did all  
16         their paperwork. Did their social assessments.  
17         I did their treatment plans. Went to their  
18         treatment plan staffings and presented a  
19         treatment plan and -- sorry. And how they were  
20         doing. The treatment team would be there, the  
21         psychiatrist, the psychologist -- I'm sorry.  
22         The psychiatrist, psychologist, activity  
23         therapist and nurse.

24           The job also entailed doing a

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1           relapse -- doing group treatment, having your  
2           own group that you did counseling of the  
3           patients, development of the relapse prevention  
4           plan, court reporting, court -- so if someone  
5           came in not guilty by reason of insanity, I  
6           wrote their court report, their NGRI court  
7           report that -- that outlined their plan for  
8           treatment and their reasons they needed to be  
9           continued -- in continued psychiatric treatment  
10          before they're discharged.

11           Updated court reports, we had to do  
12          court reports every -- how can I forget? Maybe  
13          every three months? Maybe every other month.  
14          Every other month to every three months, we  
15          wrote court reports to the court explaining  
16          where they were in their treatment, and then  
17          discharge planning.

18           Q.     So --

19           A.     And writing their conditional  
20          release packets.

21           Q.     Typically, and I understand that,  
22          of course, things ebb and flow, how many  
23          patients would you say on average were on the  
24          L Unit at a given time?

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1           **A. I believe that the capacity for the**  
2        **unit was 25 to 30. I have to give an estimate**  
3        **because I can't remember exactly, and it was**  
4        **always full.**

5           Q. And how many social workers,  
6 including yourself, were working on the L Unit?

7           **A. Two to three.**

8           Q. And how many patients would you  
9 estimate that you were working with at any  
10 given time?

11          **A. Eight to 11.**

12          Q. And you mentioned that there were a  
13 couple of different types of in-person meetings  
14 that would occur with your patients, correct?

15          **A. Uh-huh.**

16          MR. BRODY: Yes.

17          THE WITNESS: I'm sorry. Yes.

18          MS. JOHNSTON: And, again, it's so  
19 hard because even I know what you're saying  
20 right now. It's just later that this will be  
21 an issue. So thank you, Steve.

22 BY MS. JOHNSTON:

23          Q. So when you would meet with  
24 patients, so what were the types of in-person

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1 meetings that you would do where you were  
2 actually with the patient?

3 **A. Counseling.**

4 Q. And would those typically be  
5 one-on-one meetings or group meetings?

6 **A. One-on-one meetings, and there were  
7 also group meetings, but...**

8 Q. I guess what would be kind of the  
9 breakdown you would think of what percentage of  
10 the meetings that you would have would be  
11 one-on-one, versus what percentage were in a  
12 group setting?

13 **A. One on -- one-on-one sessions would  
14 be weekly, unless there was some conflicts in  
15 the schedule. Group treatment would be weekly,  
16 so 50/50.**

17 Q. And when you did the group  
18 treatment, was that typically with everybody  
19 that would have been on your caseload at the  
20 time, or was that further broken down by kind  
21 of their needs?

22 **A. It was broken down by their needs.**

23 Q. And when you would do your  
24 one-on-one sessions, where did you typically

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1 meet with your patients?

2           **A. In my office.**

3           Q. And where would the group sessions  
4 typically take place?

5           **A. In the group room or in the  
6 serenity room.**

7           Q. You said serenity?

8           **A. Yeah.**

9           Q. Thank you.

10           And, you know, did the other social  
11 workers also meet with their patients  
12 one-on-one on a weekly -- or roughly a weekly  
13 basis?

14           **A. Yes.**

15           Q. And where did the other social  
16 workers on the L Unit typically meet with their  
17 patients, to your knowledge?

18           **A. In their office.**

19           Q. And when you would meet with a  
20 patient in your office, you know, can you  
21 briefly sort of describe what the layout of  
22 your office was, if you can remember?

23           **A. So you walked in, and to the right  
24 was a desk for another social worker or an**

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1 intern. Next to that desk would be a computer.  
2 On the back wall was a window that faced to  
3 the -- oh, what do you call it? The porch, and  
4 where they would go outside for outside time.

5 Then on my back wall was a type of  
6 bookshelf with books. In that corner was a  
7 bookshelf with books, and then my desk started.  
8 It was an L shape. And then file cabinets that  
9 were not high ones, low ones. And then the  
10 door.

11 Q. And typically when you met with  
12 patients, would it be with the door opened,  
13 with the door closed?

14 A. The rule was the door closed but  
15 unlocked.

16 Q. And you said that was a rule at  
17 Elgin?

18 A. Uh-huh.

19 MR. BRODY: Yes.

20 THE WITNESS: Yes. Yes, that was a  
21 rule at Elgin.

22 MR. BRODY: By the end of the day,  
23 we're going to get you trained.

24 MS. JOHNSTON: Exactly. It just

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1       takes a little while.

2       BY MS. JOHNSTON:

3           Q.    Okay. And so when you were on the  
4       L Unit -- or really at your time at Elgin, you  
5       can tell me if I'm talking about the wrong  
6       unit, did you work with Dr. Hasina Javed?

7           A.    **Yes.**

8           Q.    And when did you work with  
9       Dr. Javed?

10          A.    **The entire time I was on the**  
11       **L Unit.**

12          Q.    L Unit. Okay.

13          A.    **She was the psychiatrist for our**  
14       **unit for the entire time.**

15          Q.    And so you said she was the  
16       psychiatrist. So what did that -- can you  
17       explain to me just sort of what that working  
18       relationship looked like.

19          A.    **So Dr. Javed was the head of the**  
20       **treatment team. So she was the head of the**  
21       **patient's treatment. She met with them once a**  
22       **month to review their medications. Sorry. She**  
23       **met with them once a month to review their**  
24       **medications. We had their treatment plan**

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1           **staffings once a month.**

2           Q.     And how often did you interact with  
3           Dr. Javed while you were on the L Unit?

4           A.     **Daily.**

5           Q.     Was that typically to discuss  
6           different patients, or was it just seeing each  
7           other around because you worked in the same,  
8           you know, general vicinity?

9           A.     **Every meeting -- we had a morning**  
10          **meeting. There's two units facing each other.**  
11          **There's a locked door, and then an open area,**  
12          **and then a locked door. And so K and L were**  
13          **considered -- we considered them sister units.**

14           **So K treatment team and L treatment**  
15          **team would meet every morning in a conference**  
16          **room to discuss the previous 24 hours.**

17           Q.     And when you said that you guys  
18          would meet to discuss the previous 24 hours,  
19          what did the -- without, you know, getting into  
20          the specifics of other patients or anything,  
21          but what did those meeting generally encompass?  
22          What types of things did you discuss?

23           A.     **The behavior of the patients. If**  
24          **there were any incidents, changes in**

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1       medication, I suppose. Updates on their  
2       treatment, if it was important. If somebody  
3       was medically compromised, we would do updates  
4       of their medical condition. We've had patients  
5       in the hospital, and things like that.

6           Q. Would you say that those morning  
7       meetings were -- the topics discussed in those  
8       morning meetings focused on the patients, not,  
9       like, administrative or Elgin staffing or  
10      operations?

11          A. No. We would discuss changes in  
12       rules or administrative decisions, so the  
13       goings on of the hospital.

14          Q. And so you saw Dr. Javed every  
15       morning in these meetings, and then were  
16       involved with her with the forming of the  
17       treatment plans and reviews for the patients  
18       that were on your caseload?

19          A. Yes. We would review treatment  
20       plans and court reports before they were  
21       submitted.

22          Q. And how close would you say that  
23       you and Dr. Javed were in terms of your working  
24       relationship? A close work friend?

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1           **A. We were close.**

2           Q. And what about outside of work, did  
3        you two have much or any of a relationship  
4        outside of being at Elgin?

5           **A. Only when -- only when we would go**  
6        **out for lunch as a treatment team.**

7           Q. And how often --

8           **A. One day -- one Christmas,**  
9        **Dr. Kareemi and Dr. Javed put together a**  
10      **Christmas party for us that we had at**  
11      **Dr. Kareemi's house.**

12           We would celebrate different  
13        things. I don't know. People's birthdays,  
14        social work month, nurses' month -- actually,  
15        it was only nurses' week. And have --  
16        everybody would bring something. I forgot what  
17        you call that when everybody brings in  
18        something to eat, and then we have -- you know,  
19        have --

20           MR. BRODY: Pot luck.

21           THE WITNESS: Pot luck. That's it.

22           Or you have, you know, an hour or  
23        so when people were off-shift or whatever, to  
24        go in the room, eat and socialize.

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1 BY MS. JOHNSTON:

2 Q. Most of those things would be  
3 work-related, even if they happened off-site,  
4 it was still more or less a work event for  
5 Elgin employees?

6 A. Yes, for our unit. Uh-huh.

7 Q. Understood.

8 And since you left Elgin in 2017,  
9 have you spoken with Dr. Javed?

10 A. I believe I may have texted her  
11 asking for a work recommendation.

12 Q. And outside of that text message,  
13 have there been any other communications with  
14 Dr. Javed since you left --

15 A. No.

16 Q. -- Elgin?

17 A. No.

18 Q. And then did you know a Dr. Faiza  
19 Kareemi?

20 A. Yes. Faiza.

21 Q. Faiza. My mistake.

22 So where did you work with  
23 Dr. Kareemi? At what stage?

24 A. Dr. Kareemi was the psychiatrist on

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1           **the K Unit, which was our sister unit.**

2           Q.     So --

3           A.     We didn't have much contact in  
4           terms of discussing patients or anything.

5                         There would be times when Dr. Javed  
6           was on vacation, and so then Dr. Kareemi would  
7           cover the L Unit.

8                         So if there were things happening  
9           with the patient, we would have meetings  
10          together, me, myself, the patient, a nurse.

11          Q.     And then you would have seen her in  
12          the morning meetings, I assume?

13          A.     Yes.

14          Q.     But outside of that, you didn't  
15          really have as much interaction with her unless  
16          it sounds like Dr. Javed was on vacation or  
17          unavailable for some reason?

18          A.     Yeah, we talked sometimes, and --  
19          sorry. We talked sometimes, and these lunches  
20          were always done between Dr. Javed and  
21          Dr. Kareemi. It was like they were taking out  
22          the two treatment teams.

23          Q.     Understood.

24                         And so how would you describe then

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1           your working relationship with Dr. Kareemi?

2           How close it was?

3           **A. We liked each other.**

4           Q.     But there was less interaction with  
5           her on a day-to-day basis than there would have  
6           been with Dr. Javed?

7           **A. Yes.**

8           Q.     And what about outside of work, did  
9           you socialize with Dr. Kareemi?

10          **A. Just the times that I've told you  
11           about when we did lunches, and when we had that  
12           Christmas party at her house.**

13          Q.     What about since you left Elgin,  
14           have you communicated with Dr. Kareemi at all?

15          **A. Not at all. I do have to -- there  
16           was an incident. I work at Panera, and she  
17           came in to buy gift cards. It was not this  
18           past Christmas, but the Christmas before. She  
19           was buying gift cards for her -- they would  
20           give us Christmas presents, and she was buying  
21           gift cards, obviously, for the treatment team.  
22           And I was there, and I was the cashier. And it  
23           was very awkward. And we said hi, and nothing  
24           else, except for the transaction, and she left.**

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1 Q. So there was no further substance  
2 to that conversation when you saw her that  
3 Christmas?

4 A. No. It was very awkward.

5 Q. And then what about Colleen  
6 Delaney? Did you know her when you worked at  
7 Elgin?

8 A. Yes.

9 Q. And what was Colleen -- what was  
10 Ms. Delaney's position?

11 A. For awhile she was nurse manager of  
12 our unit.

13 Q. And which unit would that have  
14 been?

15 A. L.

16 Q. I'm sorry. That was me. Did you  
17 say L --

18 A. L.

19 Q. -- as in Lisa?

20 A. Yes.

21 Q. Okay. Do you know when she was the  
22 nurse manager of the L Unit or roughly?

23 A. No. It was -- let me see. She  
24 wasn't -- she wasn't the first nurse manager I

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1           **experienced on L.**

2           Q.     Okay.

3           A.     I can't remember who was the nurse  
4         manager before her. Maybe she was. No. She  
5         came in after somebody else, and I don't  
6         remember who that nurse manager was. And then  
7         we had her.

8                   And for a period, we had -- I want  
9         to say we had Marianne Zuwanski for a period of  
10       time. And then we had -- oh, boy. Her first  
11       name started an N. I will remember it when I  
12       stop trying to remember it.

13                  And then Tom. Tom. I can't  
14         remember his last name right now.

15                  Q.     Okay. Well, do you remember for  
16         Colleen Delaney, you said it was a period of  
17         time while you were on L Unit. Do you remember  
18         if she was the nurse manager when you left  
19         Elgin?

20                  A.     Yes. No. No. It was Tom.

21                  Q.     So somewhere in that middle period  
22         you can say she was the nurse manager?

23                  A.     For a long portion of time.

24                  Q.     So then she was the nurse manager,

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1 and you were a social worker on the same unit.

2 Can you describe to me what that working  
3 relationship would look like or did look like?

4 A. Started out to be a good  
5 relationship, and it ended to be a bad  
6 relationship, I guess you would say.

7 Q. Why did it change from a good  
8 relationship to a bad relationship, in your  
9 opinion?

10 A. She had this thing with me.

11 Q. Okay.

12 A. She would -- she would attack me in  
13 the morning meetings verbally, and I would end  
14 up crying.

15 Q. And when you say attack you in the  
16 morning meetings, can you provide some more  
17 information about that?

18 A. I'm trying to remember all the  
19 circumstances. Okay. So there was one time I  
20 think it happened in the morning meeting, I had  
21 called out something that she told some brand  
22 new STAs. STA stands for security therapy  
23 aide. And I took that -- I asked that STA to  
24 come into my office and spoke with her. And

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1           **Colleen was not happy about that.**

2           Q.     Do you remember what it was that  
3        you spoke to the STA about?

4           A.     **Yes, I do.**

5           Q.     What was that?

6           A.     **Okay. She was orienting the STAs,**  
7        **and she told them to watch out for Ben Hurt**  
8        **because he masturbated in his room when people**  
9        **were coming to check on him.**

10          Q.     So that's what Delaney told this  
11        group of new STAs?

12          A.     **Yes. And I took great offense to**  
13        **that because Ben was my patient, and men are**  
14        **going to masturbate in their bedrooms, and that**  
15        **was really unfair of her to give that**  
16        **preconception to the STAs.**

17          Q.     So what did you then say to the STA  
18        about it?

19          A.     **I asked her what Colleen said. And**  
20        **I may have told her, you know, what I just**  
21        **said.**

22          Q.     And when you say you may have told  
23        her what you just said, that was the --

24          A.     **This is the normal --**

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1 Q. -- the men will masturbate in their  
2 private room?

3 **A. Right.**

4 Q. Did you tell the STA anything else  
5 about Ben Hurt?

6 A. I don't -- I don't recall. I don't  
7 think so.

8 Q. Did you tell the STA anything about  
9 your relationship with Mr. Hurt?

10 A. No.

11 Q. So that was the situation where you  
12 said then that --

13 A. Colleen called me out in a morning  
14 meeting. It may have been in the morning  
15 meeting. It may have been privately. I -- it  
16 may have been both. She was pretty mad.

17 Q. Do you remember what she said?

18 A. That I had no right, and it wasn't  
19 my responsibility to bring up a young,  
20 impressionable STA into my office and talk with  
21 her.

22 Q. And were there other incidents  
23 between you and Colleen Delaney?

24 A. Yes.

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1 Q. Do you remember any of those?

2 A. There was one that had to do  
3 something with some STAs, and the incident I do  
4 not remember, but the STAs were completely out  
5 of order in the way they had treated me. And  
6 we had a meeting to discuss it. And Colleen  
7 did not defend me or -- or -- it's not that I  
8 wanted her to defend me, it's that I wanted her  
9 to call the STAs out on their behavior, and she  
10 did not.

11 And then I wrote her a letter  
12 explaining how I felt about that, and brought  
13 it to her -- well, I went to her office, and  
14 said, You haven't mentioned the letter. And I  
15 was with an intern. And she was very upset  
16 that the intern was in the office with me with  
17 her thinking that should be private between me  
18 and her, and that my intern shouldn't know.

19 Q. Do you remember what it is that the  
20 STAs in question were doing that was so out of  
21 line?

22 A. I cannot remember.

23 Q. And then can you think of any other  
24 incidents with Colleen Delaney that were

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1 hostile?

2           **A. Just -- just the ones during the**  
3 **treatment team meetings.**

4           Q. But were there more incidents than  
5 what it is that we've discussed now?

6           **A. Yes.**

7           Q. Do you remember what the hostility  
8 would typically relate to?

9           **A. I don't remember them clearly, no.**  
10          **I can't --**

11          Q. Do you remember if there was kind  
12 of a general theme of what it is that these  
13 incidents of hostility would relate to?

14          **A. Like, a personal vendetta against**  
15 **me. Just I -- I don't know.**

16          Q. Is there anything else that you  
17 remember right now about those incidents of  
18 hostility with Ms. Delaney?

19          **A. Just that she would talk about it**  
20 **and look at me and be hostile and -- until I**  
21 **cried. I'm -- I'm -- I'm sometimes a very**  
22 **sensitive person.**

23          Q. So it sounds like it was a somewhat  
24 fraught relationship. But in her capacity as

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1       the -- what was her --

2           **A. Nurse manager.**

3           Q. Nurse manager. So what was your  
4       workplace interaction in that sense outside of  
5       the morning meetings, which I know would have  
6       had both of you?

7           **A. She ran the unit. She was over the  
8       nurses and the STAs. So that was her capacity.**

9                   **And then -- so she was also  
10      involved in the patients and their treatment.  
11      She would have to know that because the nurses  
12      were also treating the patients.**

13           Q. So how often would you actually  
14       have to -- and, again, outside of the morning  
15       meetings, about how often did you actually  
16       interact with Colleen Delaney sort of on a  
17       day-to-day basis?

18           **A. One day a week we could not  
19      interact at all. The next day we could  
20      interact one time, occasionally.**

21           Q. Okay. Did you have any sort of  
22       relationship with Ms. Delaney outside of work?

23           **A. No. She was -- she was on my  
24      Facebook. We were friends on Facebook when we**

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1       first got to know each other. She would talk  
2       about her personal life at -- during the  
3       treatment team meetings. She was married to  
4       another woman who worked at Elgin Mental Health  
5       Center. That woman was actually a psychology  
6       intern on another unit, and they had a  
7       relationship and got married. And they had  
8       triplets, I believe. Maybe it was twins,  
9       triplets, twins. Two sets, actually.

10                   So she would talk about them and  
11                  show us pictures, and that's when things were  
12                  good.

13                   But she continued to talk about  
14                  personal stuff at the morning meetings.

15                   Q. And, again, it was in the morning  
16                  meetings or in more of an open situation with  
17                  other Elgin employees, not specific  
18                  conversations between you two where she  
19                  confided in you?

20                   A. No.

21                   Q. Okay. And have you had any  
22                  interaction with Mr. Delaney since you left  
23                  Elgin?

24                   A. No.

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1 Q. Did you know Diana Hogan when you  
2 were at Elgin?

3 A. Yes.

4 Q. And what was her position?

5 A. Assistant nursing supervisor.

6 Q. And so what would that mean about  
7 how it is that you interacted with her through  
8 work?

9 A. Not very often.

10 Q. If she was the assistant nursing  
11 supervisor, would that be for all of Elgin or  
12 just for certain units?

13 A. All of Elgin -- all of -- all of  
14 the forensics treatment program.

15 Q. Okay. The forensics side at least,  
16 not necessarily the civil side?

17 A. No. They had their own  
18 administrators.

19 Q. Okay. And do you actually remember  
20 how many different forensic units are there at  
21 Elgin? We know that there's L and K.

22 A. There were four UST units. There  
23 was M and N. K and L. And then -- yeah. So  
24 there were four units for the NGRIIs and some of

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1           the USTs. And then there were just UST units.

2           That was H and I, F and G -- F and G, H and I.

3           So -- oh, and then there was an all  
4           women's unit. I don't think there were men on  
5           that unit, too. Wait. It started with a W.

6           THE STENOGRAPHER: Ma'am, you have  
7           to speak up, please.

8           THE WITNESS: I'm so sorry.

9           So F and G, H and I were the UST  
10          units. That's where the USTs came when they  
11          first came to the hospital. And then NGRI  
12          units were K and L, M and N. And then there  
13          was another unit that started with a W. I  
14          can't remember now. Sean would know. And I  
15          believe there were men and women on that unit.

16           But then there was another unit,  
17          right, Sean with --

18           Q. That's okay. Just either way,  
19          Diana Hogan was supervising a number -- or she  
20          was the assistant nursing supervisor to, you  
21          know --

22           **A. To the entire forensics population.**

23           Q. Okay. So she was not  
24          necessarily -- how involved would you say she

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1 was in the day-to-day operations of the L Unit  
2 when you were there?

3 **A. Not very involved.**

4 Q. Okay. And when would you interact  
5 with Diana Hogan?

6 **A. When I went up to administration  
7 sometimes to be in her office.**

8 Q. Was Diana Hogan one of the people  
9 who would be present at the morning meetings?

10 A. No. Administration didn't come to  
11 the morning meetings unless they had something  
12 to announce or --

13 Q. So if you were going to describe  
14 your relationship with Diana Hogan, how would  
15 you describe that?

16 A. The only word I can think of is  
17 affable. It was -- there was no tension or  
18 anything. She was a nice person.

19 Q. Okay. Would you say that you two  
20 were close at all?

21 A. No.

22 Q. Did you ever socialize with Diana  
23 Hogan or see her outside of work?

24 A. No.

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1 Q. And have you spoken to her in any  
2 capacity since having left Elgin?

3 A. No.

4 Q. And then did you know Drew Beck  
5 while you were at Elgin?

6 A. Yes.

7 Q. What was his position?

8 A. Social worker on the K Unit.

9 Q. So if he was a social worker on the  
10 K Unit, I understand that he would have been at  
11 the morning meeting because you guys were  
12 sister units.

13 A. Uh-huh.

14 Q. Then outside of that, what was  
15 really your working relationship with Drew  
16 Beck?

17 A. In terms of work?

18 Q. Yes.

19 A. Just -- just the treatment --  
20 morning treatment meetings conferring about  
21 patients, and -- so Drew was a -- probably  
22 still is, a professor at ECC, and I don't know  
23 why that makes any difference, except that he  
24 had interns, just like I did. And he had a

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1 group that he did with the interns that were on  
2 K and L. And he had a group that he had where  
3 he imposed his knowledge to the interns of  
4 other people and his own.

5 Q. So kind of like small --

6 A. Like, a supervision kind of  
7 meeting.

8 Q. Okay.

9 A. I'm sorry.

10 Q. No, not a problem. I was just  
11 going to say, like, a mentorship or small group  
12 clinic type of thing with the interns?

13 A. Correct.

14 And then there was a time when he,  
15 I and Michelle -- I can't remember her name.  
16 She's the director of the forensics -- no.  
17 She's the director of the whole hospital now.  
18 Michelle -- I'll think of her name. And she  
19 and I and him also ran a group together with  
20 the interns. I think twice, maybe once was  
21 just Drew and I. Yes. Once was just Drew and  
22 I, and once was Michelle, Drew and I.

23 Q. So when you say you were in that  
24 group, does that mean you were doing a bit more

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1 work with him in order to prepare for running  
2 that group with the interns?

3           **A. Yeah, a little bit.**

4           Q. How close would you say that you  
5 and Drew Beck were when you worked at Elgin?

6           A. In the beginning, we would sit and  
7 talk about personal stuff. But then toward the  
8 end, not so much. He took a more supervisory  
9 role because that's just the kind of person he  
10 was. He wasn't a Social Worker III, but he  
11 wasn't over the other social workers, but  
12 sometimes he acted like he was.

13          Q. And you said at the beginning you  
14 guys would talk about personal stuff, and then  
15 that did switch?

16          A. Yeah. We --

17          Q. Do you know --

18          A. Do I know why? We just -- we just  
19 drifted a part. I don't think there was any  
20 particular reason. Maybe we were too busy. We  
21 got -- we got -- we got really busy because we  
22 didn't have enough social workers.

23          Q. And did you ever have a  
24 relationship or a friendship with Drew Beck

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1 outside of work?

2 A. One -- once we went shopping, and I  
3 can't remember why. We went to Kohl's. And  
4 once I was the -- I planned a retirement for  
5 one of the social workers who left, and he  
6 helped me. He and I went to Costco to pick up  
7 food and cake and stuff for the retirement  
8 party.

9 That was way more than in the  
10 beginning of my time at L.

11 Q. Your time in the L Unit then?

12 A. Uh-huh.

13 Q. Do you know, was Drew Beck -- had  
14 he been on the L -- or the K Unit the entire  
15 time that you were on L?

16 A. Was he on K the entire time I was  
17 on L? Yes.

18 Q. Meaning that you guys were also  
19 working on the sister units?

20 A. Yes.

21 Q. Okay. And have you spoken with  
22 Drew Beck at all since you left Elgin?

23 A. You know what, he may have come  
24 after -- no, he came after some time. I can't

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1       **remember who the other social worker was, but**  
2       **he did replace somebody at some point.**

3           Q.    Okay. So he wasn't there right  
4       when you started on L Unit?

5           A.    No, I don't think so. I think he  
6       replaced the man who retired, but that doesn't  
7       make sense because then me and Drew wouldn't  
8       have done that. So he replaced somebody.

9           Q.    But then since you've left Elgin,  
10       have you spoken to or communicated with Drew  
11       Beck at all --

12          A.    **No, I have not.**

13           MS. JOHNSTON: I actually think I  
14       know we've been going for just about an hour,  
15       maybe a little bit more. Do you want a five  
16       minute break to stretch your legs, whatever?  
17       Have a glass of water. Is everybody okay with  
18       five?

19           THE WITNESS: Yes, I'd like a glass  
20       of water. That would be nice.

21           MS. JOHNSTON: We'll just take a  
22       quick few minutes and then we'll reconvene.  
23       Okay?

24           THE WITNESS: Okay.

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1 (A recess was had.)

2 MS. JOHNSTON: Let's go back on the  
3 record. It is 10:33 a.m.

4 BY MS. JOHNSTON:

5 Q. Okay. Christy, so getting back  
6 into our questioning.

7 When you were working at Elgin, did  
8 you know a patient named Mark Owens?

9 A. Yes.

10 Q. And when, roughly, did you meet  
11 Mr. Owens?

12 A. I don't remember. Whenever he was  
13 admitted. I'm sure you have that information.

14 Q. And --

15 A. I admitted him.

16 Q. Okay. So you were his admitting  
17 social worker, if you will?

18 A. Yes.

19 Q. And then did you continue to be his  
20 social worker?

21 A. Yes.

22 Q. So would you say when you first met  
23 Mark Owens, your relationship with him was  
24 social worker patient?

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1           **A.     Correct.**

2           Q.     And do you know that his lawsuit is  
3       one of the reasons that we're here today?

4           **A.     Yes.**

5           Q.     And is it true that you're no  
6       longer a defendant in that lawsuit?

7           **A.     Yes.**

8           Q.     Did you settle with Mr. Owens in  
9       that case?

10          **A.     Yes.**

11          Q.     And I believe the settlement was  
12       for \$1?

13          **A.     Yes.**

14          Q.     And as a part of that, you also  
15       signed an affidavit?

16          **A.     Yes.**

17           MS. JOHNSTON: Okay. And, Amanda,  
18       if you could help me out now when you have -- I  
19       know you might need a minute. I should have  
20       given you a heads up. If you could go ahead,  
21       and it's Exhibit 1, the Mark Owens settlement  
22       agreement.

23           MS. KOZAR: Okay. Hang on.

24           MS. JOHNSTON: While you're pulling

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1       that up, I can actually say because I might be  
2       able to streamline this a bit more.

3                   So previously, Randy and Joe, I  
4       know that we just agreed to stipulate to the  
5       authenticity of the agreement. It's, you know,  
6       a file, court document.

7                   MR. CECALA: Yes.

8                   MS. JOHNSTON: Steve, if you -- and  
9       I think you had it before, but Steve, would you  
10      also be willing to stipulate to the  
11      authenticity of the settlement agreement and  
12      waiver?

13                  MR. BRODY: Yes.

14                  MS. JOHNSTON: Okay. And,  
15      obviously, if you have any time where you want  
16      to look at it in more detail, I sent it last  
17      night, you can take a moment if you need to.

18                  MR. BRODY: If it would be easier,  
19      I could print it so Christy has a hard copy in  
20      front of her, or you can use the screen share.  
21      We're indifferent.

22                  MS. JOHNSTON: I mean, Christy, I  
23      would say that that's really your decision.  
24      It's not going to be a huge amount of looking

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1 at it, but if it's easier for you to read it  
2 off a piece of paper, and if Steve has a  
3 printer readily available, we can give it a  
4 minute so you can look at it that way.

5 THE WITNESS: Since maybe you might  
6 not be scrolling to the right spot, that would  
7 be helpful.

8 MR. CECALA: I don't want to be  
9 talking over. I was going to say, we're  
10 stipulating to the settlement agreement. I was  
11 going to make an objection that, you know, the  
12 settlement agreement is significantly more than  
13 \$1. There's -- the contents of it speak for  
14 themselves. So just making a clean record of  
15 what the contents of the settlement agreement  
16 are in the settlement agreement, it's not a \$1  
17 settlement.

18 THE WITNESS: I agree with you on  
19 that.

20 MS. JOHNSTON: And I will stipulate  
21 that the agreement speaks for itself.

22 MS. KOZAR: Mary, so do you still  
23 want me to share my screen?

24 MS. JOHNSTON: Steve, if you're

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1 able to print that out. Everybody on our  
2 end --

3 MR. BRODY: I'm able to print it.

4 Which one do you want? The Owens' one first?

5 MS. JOHNSTON: Yeah, that would be  
6 the first one. I mean, honestly, we'll look at  
7 all four of the e-mails that I sent over. So  
8 if you just want to go ahead and get going on  
9 it, that's fine. But I don't know --

10 MR. BRODY: I'm doing it now.

11 MS. JOHNSTON: I don't have any  
12 objection to all of us just looking at it on  
13 our respective screens, if that's fine for  
14 everybody else. I know I sent out copies of  
15 the exhibits in advance.

16 MS. NEWMAN: Mary, I just might --  
17 Amanda, if you have problems pointing, you  
18 might want me to point out a specific place in  
19 the agreement. Maybe Amanda might be ready to  
20 screen share just in case we have any  
21 difficulty finding the exact passage that you  
22 want to point to.

23 MS. JOHNSTON: Yeah. And  
24 realistically, I can tell you now that as we

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1 have stipulated to the agreement itself, we're  
2 not going to go through all of it. So what  
3 will be getting pulled up is on page 11 out of  
4 13 is where we'll focus.

5 MR. BRODY: On the Owens one, I've  
6 got nine pages.

7 So you were mentioning page 11. It  
8 ends on page nine.

9 MR. CECALA: Were you talking about  
10 the Hurt one possibly?

11 MS. JOHNSTON: I don't know.

12 THE STENOGRAPHER: Do you want this  
13 on the record?

14 MS. JOHNSTON: No, we can take --  
15 thanks, Gay. We can off the record.

16 (Discussion had off the  
17 record.)

18 BY MS. JOHNSTON:

19 Q. So, Ms. Lenhardt, you may have  
20 heard earlier, all of the attorneys here have  
21 stipulated that this is an accurate copy of the  
22 settlement agreement and the affidavit that you  
23 signed in the Owens case, and you have been  
24 given a copy of this printed out by your

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1 lawyer.

2                   But if you want to take a quick  
3 look at it just to familiarize yourself with  
4 it.

5                   Do you recognize this as the  
6 affidavit that you signed in the Owens case?

7                   **A. Yes.**

8                   Q. Okay. And if you can look to  
9 paragraph nine of the affidavit there. I  
10 believe, that Mr. Brody previously pointed it  
11 out to you?

12                   (Exhibit No. 1 referenced.)

13                   **A. Yes.**

14                   Q. Okay. And would you be able to  
15 read that paragraph 9 starting with "In the  
16 past," into the record.

17                   **A. Okay. In the past I have made the**  
18 **serious mistake of becoming sexually involved**  
19 **with a patient. No such thing occurred with**  
20 **the plaintiff, Mark Owens. I'm aware that**  
21 **Mr. Owens claims he interpreted my behavior**  
22 **toward him as seductive, and that because he is**  
23 **religious, that made him feel uncomfortable. I**  
24 **cannot account for Mr. Owens' statement about**

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1       this, but I did not intend to seduce him. It  
2       may be that he was hypervigilant because of  
3       rumors at EMHC. I believe that due to his  
4       discomfort, he told Hasina Javed he did not  
5       want to continue counseling sessions in my  
6       private office.

7                  In response, his counseling  
8       sessions were held in the unit conference room.  
9       (As read).

10          Q. And then if we could look at the  
11       next page starting with paragraph 10. If you  
12       could just read that paragraph 10.

13          A. Paragraph 10. I did not want  
14       Dr. Javed to have any knowledge or suspicion  
15       that I was involved in a sexual relationship  
16       with a patient, nor did I want her to suspect  
17       that I was acting in a seductive manner towards  
18       any patient. (As read).

19          Q. And you know that when you signed  
20       this affidavit, you were swearing that these  
21       statements were true and accurate?

22          A. Yes.

23          Q. And were those two paragraphs that  
24       you read just now accurate?

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1           **A. Yes.**

2           Q. And as such, you never had a sexual  
3 relationship with Mark Owens?

4           **A. No.**

5           Q. And did you ever touch Mr. Owens in  
6 a sexual manner?

7           **A. No.**

8           Q. Did you ever fondle Mr. Owens?

9           **A. No.**

10          Q. Did he ever fondle you?

11          **A. No.**

12          Q. Did he ever expose himself to you?

13          **A. No.**

14          Q. Did you ever expose yourself to  
15 him?

16          **A. No.**

17          Q. Did you ever kiss Mr. Owens?

18          **A. No.**

19          Q. Did you ever engage in any sexual  
20 intercourse, including, you know, oral or  
21 penetrative sexual intercourse with Mr. Owens?

22          **A. No.**

23          Q. Okay. And what is your  
24 understanding of why Mr. Owens filed the

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1 lawsuit?

2           **A. My understanding is that he**  
3         **believed there was (audio distortion), is lying**  
4         **that there was, but there was not.**

5           Q. And you stated there that Mr. Owens  
6         stated he was uncomfortable, and -- let me pull  
7         up the exact language. I apologize.

8                  That Mr. Owens told Javed that he  
9         did not want to continue the counseling  
10        sessions in your office?

11           **A. Correct.**

12           Q. Okay. And do you remember  
13        discussing that at all with Dr. Javed?

14           **A. It was my understanding that**  
15         **because he had become Muslim, a lot of the**  
16         **black patients because -- become Muslim when**  
17         **they enter into Elgin Mental Health Center.**  
18         Part of that reason is we had a patient named  
19         Omar who would speak to them and read to them  
20         through the Koran, and influence them to become  
21         Muslim.

22                  And his intention was good. It  
23         wasn't -- I can't think of the word. It wasn't  
24         evil or anything.

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1                   MR. CECALA: I'm having trouble  
2 hearing Christy's testimony. Sorry, Christy.

3                   MS. JOHNSTON: A little bit, yeah.

4                   THE WITNESS: All right. It was my  
5 understanding that the reason that the sessions  
6 moved to the conference room is because he was  
7 uncomfortable as a person following the Muslim  
8 faith to be in a room with a woman.

9                   BY MS. JOHNSTON:

10                  Q. So it was your understanding that  
11 that would have just been discomfort really  
12 with any woman that he would have been meeting  
13 alone with?

14                  A. Yes.

15                  Q. And to clarify, that is your  
16 understanding as to why it is that he asked to  
17 have your counseling sessions conducted in the  
18 conference room from that point forward?

19                  A. Yes. No one told me anything about  
20 any sexual behavior.

21                  Q. Okay. So when you discussed this  
22 with Dr. Javed, what did she say to you about  
23 why the meetings would be taking place in the  
24 conference room as opposed to in your

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1 individual office?

2           **A. That he was uncomfortable meeting**  
3           **with me in my office.**

4           Q. Did Dr. Javed say anything else  
5 about why?

6           **A. No, not that I recall.**

7           Q. And did you ever discuss the  
8 decision to meet with -- or to stop meeting  
9 with Mr. Owens in your office with Dr. Kareemi?

10          **A. No.**

11          Q. Did you ever discuss --

12          **A. She wasn't -- she wasn't his**  
13          **psychiatrist. She was on the other unit.**

14          Q. Did you ever discuss that decision  
15 to stop meeting with Mr. Owens in your office  
16 with Colleen Delaney?

17          **A. No.**

18          Q. Did you ever discuss that decision  
19 with Diana Hogan?

20          **A. No, not that I recall discussing it**  
21          **with anybody, except Dr. Javed.**

22          Q. Okay. So -- and that was going to  
23 be my next question. Did you discuss it with  
24 Drew Beck at any point in time?

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1                   **A. With who?**

2                   MR. BRODY: Drew Beck.

3                   BY MS. JOHNSTON:

4                   Q. Drew Beck.

5                   **A. Oh. No.**

6                   Q. And you said that you think that  
7                   you only just --

8                   THE STENOGRAPHER: I didn't hear  
9                   you.

10                  THE WITNESS: No, I do not recall.

11                  Not that I recall, did I ever speak to Drew  
12                  Beck about it.

13                  BY MS. JOHNSTON:

14                  Q. Okay. And is there anybody else  
15                  outside of Dr. Javed that you think that you  
16                  ever discussed that with?

17                  **A. No, I don't think so.**

18                  Q. And is that everything that you  
19                  remember right now about why it is that you  
20                  stopped meeting with Mark Owens in your office  
21                  and started meeting with him in the conference  
22                  room?

23                  **A. It is everything I remember right**  
24                  **now.**

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1           Q.    Okay. And then when you were at  
2         Elgin, did you have -- or did you know a  
3         patient named Ben Hurt?

4           **A.    Yes.**

5           Q.    And how did you meet Mr. Hurt?

6           **A.    I admitted Ben Hurt to the**  
7         **hospital.**

8           Q.    So you admitted him, and then were  
9         you his social worker as well?

10          **A.    Yes.**

11          Q.    And do you remember, roughly -- and  
12         as you said, I know that we can get the exact  
13         dates, but do you have an estimate in your mind  
14         as to when it was that Mr. Hurt was admitted to  
15         Elgin?

16          **A.    Well, if he had a three year date**  
17         **for release and it was in 2017, then it would**  
18         **have been 2014.**

19          Q.    Okay. And do you remember why Ben  
20         Hurt was admitted to the L Unit at Elgin?

21          **A.    Aggravated battery toward a police**  
22         **officer.**

23          Q.    When Mr. Hurt was first admitted to  
24         Elgin and you did his admitting paperwork and

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1       were assigned as his social worker, what was  
2       your relationship with Mr. Hurt like when he  
3       first came to the L Unit?

4           **A. Strictly social worker and patient.**

5           Q. And I know that we've talked a bit  
6       before about kind of your general duties as a  
7       social worker, but is there any -- can you just  
8       give me some background about what that exactly  
9       meant, as it relates to Mr. Hurt? What would  
10      you do with him, and how often would you see  
11      him?

12           **A. So I admitted him, and got his  
13       background information for the admission papers  
14       and the start of his social assessment. I  
15       welcomed him to the unit. I tried to make  
16       people feel comfortable when they come in.**

17           Q. Okay. And so how often would you  
18       meet with Mr. Hurt?

19           **A. Once a week. Maybe not in the  
20       beginning, but I had to meet with him to get  
21       his social assessment information and develop a  
22       treatment plan and do his NGRI evaluation. The  
23       NGRI evaluation is the document that goes to  
24       court that explains everything, why he's in the**

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1                   **hospital.**

2                   **From all the information that we**  
3                   **get, I compile it and summarize it, make the --**  
4                   **it's not exactly a treatment plan, but there**  
5                   **are points that you have to cover. And then**  
6                   **you're explaining why they continue to need**  
7                   **psychiatric treatment and need to stay in the**  
8                   **hospital.**

9                   Q. And so you said you would meet with  
10                  him, maybe not once a week at the very  
11                  beginning, but then did it turn into having  
12                  weekly individual meetings with him?

13                  **A. Yes.**

14                  Q. And was he also in any group  
15                  meetings?

16                  **A. Yes.**

17                  Q. Do you remember what his group was  
18                  in terms -- sorry.

19                  **A. I --**

20                  Q. Also to just clarify, in terms of  
21                  the content of the meeting, not who else was in  
22                  the meeting.

23                  **A. Aspects of healthy living. And I**  
24                  **can't remember what I called it. It was a**

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1           **group about meditation.**

2           Q.     What did aspects of healthy living  
3           cover?

4           A.     **Aspects of healthy living. Coping**  
5           **skills -- coping skills. Ways to handle your**  
6           **emotions. Ways to handle your mental health**  
7           **issues. How to navigate life.**

8           Q.     Okay. So that is the aspects of  
9           healthy living, as you said.

10           And so at any point in time, did  
11           you enter into a sexual relationship with  
12           Mr. Hurt?

13           A.     **Yes, I did.**

14           Q.     Do you know roughly when that  
15           happened?

16           A.     **No.**

17           Q.     I guess put another way, would you  
18           be able to estimate how long he was there  
19           before the relationship took that turn?

20           A.     **I can't remember the month he was**  
21           **admitted. I'm just guessing eight months.**

22           MR. BRODY: Don't guess.

23           THE WITNESS: Okay. I can't guess.  
24           You said I can't guess.

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1 BY MS. JOHNSTON:

2 Q. No, that's fine. We want to know  
3 what you know. And, again, if you don't -- if  
4 you know something, that's okay.

5 I just wanted to know if you had an  
6 estimate as to how long you were his social  
7 worker before the relationship also went to a  
8 sexual one, and not purely social worker and a  
9 patient relationship.

10 But so when you did enter into a  
11 relationship with Mr. Hurt, is -- did you try  
12 to hide that relationship?

13 A. Yes.

14 Q. Why?

15 A. Because it wasn't appropriate, and  
16 I could lose my job, and he could get into  
17 trouble.

18 Q. So you said that you and -- you  
19 could get into trouble if this was found out,  
20 correct?

21 A. Along with him, yes.

22 Q. How would he get into trouble?

23 A. It would go in his court report and  
24 affect whether he could leave earlier or not.

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1           Q.    Okay. And then in terms of the  
2         impact this could have on you if the  
3         relationship was discovered, so you stated that  
4         you could lose your job?

5           **A.    Yes.**

6           Q.    And would that involve losing your  
7         social worker's license?

8           **A.    I hadn't thought that far ahead,**  
9         **but yes.**

10          Q.    Let's talk about what it is that  
11         has happened since this information came to  
12         light.

13          So you are no longer employed at  
14         Elgin?

15          **A.    Uh-huh.**

16          MR. BRODY: Yes.

17          THE WITNESS: Yes.

18          BY MS. JOHNSTON:

19          Q.    And do you still have your social  
20         worker's license?

21          **A.    I do not.**

22          Q.    Okay. What about did you have a  
23         pension through your employment at Elgin?

24          **A.    Yes.**

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1 Q. Were you able to retain that  
2 pension?

3 A. No. I got the value of it, like,  
4 what -- I got what I contributed to it. I did  
5 not get the pension where you get the  
6 monthly --

7 Q. Okay. But you basically got back  
8 what you had paid in?

9 A. What I contributed, yeah.

10 Q. Okay. And then were criminal  
11 charges ever filed against you in relation to  
12 this?

13 A. Yes.

14 Q. And were you convicted?

15 A. I took a plea deal.

16 Q. Okay.

17 A. I did not want it to go to trial  
18 and affect my family.

19 Q. And now has this impacted your  
20 relationship with your family?

21 A. Yes.

22 Q. How so?

23 MR. BRODY: Objection. Relevance.

24 MS. JOHNSTON: You can go ahead and

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1 answer.

2 MR. BRODY: Go ahead.

3 THE WITNESS: Well, obviously, I  
4 had to work it out with my husband, my parents.  
5 My husband's family refused to allow me to  
6 attend any of their events. Weddings,  
7 Thanksgiving, Christmas, they did not want me  
8 to associate with them.

9 BY MS. JOHNSTON:

10 Q. So, generally speaking, you were  
11 aware that there would be or could be very  
12 serious consequences if your relationship with  
13 Mr. Hurt was discovered?

14 A. Yes.

15 Q. And as such, you actively tried to  
16 keep people from finding out about the sexual  
17 relationship between you two?

18 A. Yes. And I want to state the  
19 sexual relationship was completely secondary.  
20 We had an intimate relationship before that  
21 ever happened. An emotional relationship.  
22 That was the most important, not the sexual  
23 part.

24 Q. How long do you think that you had

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1 had more than an emotional relationship with  
2 Mr. Hurt before the sexual relationship began?

3 **A. I can't even guess.**

4 Q. And you stated that you didn't  
5 discuss this relationship with your friends?

6 **A. No.**

7 Q. And did you discuss the  
8 relationship with your family at all?

9 A. No. Well, after it came to light,  
10 yes.

11 Q. And I mean before.

12 A. No.

13 Q. And did you --

14 A. Oh, I -- go ahead.

15 Q. No. I'm sorry. I didn't mean to  
16 interrupt you.

17 A. I never discussed it with anyone.

18 Q. And that includes people at work?

19 A. Yes.

20 Q. So -- and I know that this might  
21 get redundant, but did you ever discuss your  
22 relationship outside of the social  
23 worker-patient context with Ben Hurt with  
24 Dr. Javed?

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1           **A. No.**

2           Q. Did you ever discuss it with  
3 Dr. Kareemi?

4           **A. No.**

5           Q. Did you ever discuss it with  
6 Colleen Delaney?

7           **A. No.**

8           Q. Did you ever discuss it with Diana  
9 Hogan?

10          **A. No.**

11          Q. Did you ever discuss it with Drew  
12 Beck?

13          **A. No.**

14          Q. Did you ever --

15          **A. There were -- there were times when**  
16 **they came to talk to me presumably about it,**  
17 **but I never went and told them about it or told**  
18 **them about it during those meetings.**

19          Q. Okay. So when you say that there  
20 were times when they came to talk to you, can  
21 you tell me more about any of those instances.

22          **A. Dr. Javed came to my office, and I**  
23 **can't explain it, but we're talking very**  
24 **professional people who can talk around things,**

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1       and it was talked around. It was never  
2       explicitly mentioned, but it was, obviously,  
3       about my inappropriate relationship with him.  
4       Not about sex, but about being too close to  
5       him.

6                   And she said, "Every time I come to  
7       your door, Ben is in your office." She said,  
8       "You have a lovely, beautiful family." That's  
9       about all I remember.

10          Q. Do you remember when this  
11       conversation took place?

12          A. No.

13          Q. And you said that you believe that  
14       kind of the tenor of the conversation was about  
15       your relationship with Ben Hurt being overly  
16       close, correct?

17          A. Yes.

18          Q. But that it didn't necessarily  
19       relate to there being an actual sexual  
20       relationship?

21          A. Correct.

22          Q. So what do you think that could  
23       have meant if they thought the relationship was  
24       close, but not sexual?

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1           **A. That I crossed boundaries.**

2           Q. What kind of boundaries would those  
3       be then that could be crossed out having a  
4       sexual relationship?

5           **A. That it was -- that my relationship  
6       had become -- had crossed boundaries between a  
7       treatment professional relationship and a  
8       personal relationship.**

9           MR. CECALA: I'm going to make an  
10      objection. It's calling for her to speculate  
11      on what Dr. Javed was thinking, or what  
12      Dr. Javed's viewpoints were. I think she's  
13      asked and answered the question. And we can  
14      ask Dr. Javed what she thought when she was  
15      telling her they were too close.

16           MS. JOHNSTON: Okay. And yeah, I  
17      was just also asking what it is that Christy  
18      thought because she specifically stated that  
19      Dr. Javed didn't say anything explicit. So I  
20      was just making sure I understood what her read  
21      of the situation was.

22           BY MS. JOHNSTON:

23           Q. But you do state that Dr. Javed  
24      never told you that she thought that you and

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1 Mr. Hurt were engaged in a sexual relationship?

2           **A. Correct.**

3           Q. And do you have any reason to  
4 believe that Dr. Javed had ever seen you and  
5 Mr. Hurt engage in any sort of sexual activity?

6           **A. Not that I know of.**

7           Q. Okay. Typically speaking, where  
8 would any encounters that you had with Mr. Hurt  
9 take place?

10          **A. In my office. And later in Bob  
11 Hamlin's office.**

12          Q. And when you were in your office,  
13 would that be kind of -- you previously  
14 described that there was a window in your  
15 office, correct?

16          **A. Yeah. There's -- well, yeah. I  
17 talked about the window that went out to the  
18 outside where they --**

19           MR. BRODY: The courtyard.

20           THE WITNESS: The courtyard.

21          That's what it was called, the courtyard. And  
22 then there's a door and a window -- I mean,  
23 there's a window in the door.

24

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1 BY MS. JOHNSTON:

2 Q. Okay. Would you and Mr. Hurt kind  
3 of purposely position yourself to reduce the  
4 likelihood that you would be seen?

5 A. **Yes.**

6 Q. Okay. And you said that, to your  
7 knowledge, Dr. Javed never actually saw  
8 something physical happen between you and  
9 Mr. Hurt?

10 A. **To my knowledge. He was in front**  
11 **of me, so I could not see the door -- or the**  
12 **window. He would turn and look and make sure**  
13 **nobody was looking in the window.**

14 Q. And at no point in time, did he  
15 ever tell you that Dr. Javed just looked in?

16 A. **Right.**

17 Q. And she never mentioned having seen  
18 an actual physical interaction between you and  
19 Mr. Hurt?

20 A. **Correct.**

21 Q. And there's one situation that you  
22 said where she mentioned that Mr. Hurt was  
23 always in your office when she walked by, but  
24 that was the extent of that conversation?

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1           **A. It was kind of like a warning.**

2           Q. But, again, she never actually said  
3           that she thought that you had crossed a line in  
4           terms of a sexual relationship with Mr. Hurt?

5           **A. Correct.**

6           Q. And was that the only time that you  
7           ever had a conversation like that with  
8           Dr. Javed, that you remember?

9           **A. No.**

10          Q. And what -- when did you have the  
11         next conversation or was it a previous  
12         conversation?

13          **A. After -- it was after the incident**  
14         **in Bob Hamlin's office, she told me to stop**  
15         **going to K --**

16          Q. Okay.

17          **A. -- Unit.**

18          Q. Understood.

19           And let's actually just discuss the  
20         incident in Bob Hamlin's office.

21          **A. Okay.**

22          Q. Can you tell me what happened?

23          **A. I would go over -- you don't need**  
24         **to know the reason.**

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I was in Bob Hamlin's office. He  
came to talk to me like he usually did. He  
came in and eventually closed the door, and I  
went "No," because there was something wrong  
with the door where it was -- Bob told me about  
it. And told me that they had put in two or  
three work orders to get it fixed because it  
would lock from the inside. It -- they would  
have trouble getting it open.

So he closed the door. He ended up  
wanting to have sex, and we had sex. And then  
when we went to leave, the door was locked, and  
we couldn't get out.

And then we tried really hard for a  
long time to try to get it to open. And then I  
called the nurse's station to tell them that I  
was locked in the office with Ben. And I -- we  
needed help getting out.

Q. I assume at some point somebody did  
come and help you get out of the --

A. First the nurse and the STA came  
and tried to open the door. And they were  
freaking out. They were pretty nervous about  
it.

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1                   **And then they called security and**  
2                   **security came. And then, like, a locksmith,**  
3                   **whoever worked at Elgin Mental Health Center**  
4                   **with his orders came, and they couldn't get it**  
5                   **open. And they drilled it so that it would**  
6                   **open.**

7                   Q.     Okay.

8                   A.     **So it was a big hullabaloo.**  
9                   **Patients were standing around. Lots of**  
10                  **security. It was very embarrassing.**

11                  Q.     And you said that you were in Bob  
12                  Hamlin's office. Where is Bob Hamlin's office  
13                  located?

14                  A.     **On K Unit.**

15                  Q.     And why were you in there?

16                  A.     **So Bob had a patient who was**  
17                  **transferred to me. And he had developed an**  
18                  **incentive program with that patient where if**  
19                  **the patient -- he was a developmentally**  
20                  **disabled patient. And if he did well for the**  
21                  **day, then he got a snack. And Bob was a very**  
22                  **conscientious person, and he didn't want me to**  
23                  **pay for the snacks since he started the**  
24                  **program.**

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1                   **So I would go to his office at the**  
2                   **end of every day to get the snacks to put in**  
3                   **Nathaniel's nutrition box.**

4                   Q.     Okay. And so at this point in  
5                   time, where was Mr. Hurt residing?

6                   A.     **Mr. Hurt had moved; had been**  
7                   **transferred to K.**

8                   Q.     Do you know why Mr. Hurt was  
9                   transferred to the K Unit?

10                  A.     **They wanted -- oh, initially it was**  
11                  **because of a fight that had occurred between**  
12                  **him and another patient, and they needed to**  
13                  **get -- they needed to separate them.**

14                  Q.     Okay.

15                  A.     **The patient had harassed him and**  
16                  **harassed him and harassed him until he started**  
17                  **a physical fight.**

18                  Q.     And do you know who Mr. Hurt's  
19                  social worker on the K Unit was?

20                  A.     **Initially it was Bob Hamlin.**

21                  Q.     And then did it become somebody  
22                  else?

23                  A.     **Drew's. It -- he became Drew**  
24                  **Beck's. Drew Beck became his social worker.**

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1           Q. And then during that time when he  
2         was on the K Unit, it means that his, like,  
3         treating psychiatrist would have been  
4         Dr. Kareemi instead of Dr. Javed?

5           **A. Correct.**

6           Q. Okay. So you went to Bob Hamlin's  
7         office that day, which is on the K Unit, to get  
8         the snack for the incentive program that had  
9         already been established related to this other  
10       patient?

11          **A. Uh-huh, my patient now.**

12          Q. Your patient now?

13          **A. Yes. That patient had been**  
14         **transferred from K to L. He had been Bob**  
15         **Hamlin's patient, and we continued the**  
16         **incentive program, which Bob continued to pay**  
17         **for, and he kept the snacks in his office. And**  
18         **so I would go to K to get the snacks.**

19          Q. And you previously said that you  
20         would go to the K Unit every day to get these  
21         snacks out of Mr. Hamlin's office?

22          **A. Yes. Because he got a snack every**  
23         **day unless he acted up.**

24          Q. All right. So it was not unusual

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1 for you to go into Bob Hamlin's office to get a  
2 snack?

3           **A. For that purpose, it was not**  
4           **unusual, no.**

5           Q. And how long had that been going on  
6 with you going over to Bob Hamlin's office to  
7 get the snack for the incentive program before  
8 the incident happened with you and Mr. Hurt  
9 being locked in?

10          **A. I can't even guess. Months.**

11          Q. Okay. So a little while though?  
12 More than -- it wasn't, you know, day four of  
13 you going over there?

14          **A. No. No way.**

15          Q. Okay. And so then you said  
16 Mr. Hurt came in while you were already in  
17 Mr. Hamlin's' office?

18          **A. He would come and talk to me at the**  
19 **doorway, and then come in to take the box off**  
20 **the -- the tall filing cabinet, so I could get**  
21 **the snacks, and then we would talk for awhile.**

22          Q. Okay. And was that pretty typical  
23 for when you would go and get the incentive  
24 snack?

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1           **A. Yeah, it happened every day --**

2           Q. And did more than Mr. Hurt talking  
3           with you and lifting the box up happen every  
4           day? Was there any --

5           **A. Yes.**

6           Q. -- sort of -- sorry.

7           **A. Yes.**

8           Q. Okay. But this was the only time  
9           when -- was this the only time that you two had  
10          sex in Bob Hamlin's office?

11          **A. It's the only time we had  
12          intercourse in Bob Hamlin's office.**

13          Q. Okay. And is that the only time  
14          that you got locked into the office?

15          **A. Correct.**

16          Q. Okay. And when you had to call --  
17          sorry. Who did you call first? Was it the  
18          nurses' station?

19          **A. I called the nurses' station.**

20          Q. Okay. Do you remember what you  
21          told them?

22          **A. That I was in Bob Hamlin's office  
23          with Ben Hurt, and we couldn't open the door.**

24          Q. And do you remember what they said

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1       in response to that?

2           **A. Just that they were going to come**  
3           **and help let me out.**

4           Q. And how long did it take for  
5           somebody to get over from the nurses' station  
6           to Bob's office?

7           **A. A minute.**

8           Q. And you stated that then they  
9           weren't able to open the door. Did you call  
10          security then, or did one of those --

11          **A. No. They did.**

12          Q. Sorry?

13          **A. No, they did.**

14          Q. And you mentioned that a lot of  
15          people were around. Who did you see that  
16          actually kind of witnessed the unlocking or  
17          process of unlocking the office?

18          **A. Well, definitely Chief Epperson.**  
19          **Actually, he was -- actually, I don't know if**  
20          **he was there. I know he was in the nurses'**  
21          **station. So it would have been other security**  
22          **guards. It would have been patients. Patients**  
23          **and security guards.**

24          Q. Do you remember if Dr. Javed came

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1 by at any time when you were locked in the  
2 office?

3 A. No. It was after. She left at  
4 3:00, and I left at 4:00. So I would do this  
5 around 3:30. Neither -- but Dr. Kareemi and  
6 Dr. Javed left at 3:00.

7 Q. And what about Colleen Delaney, was  
8 she in the area --

9 A. No. She was --

10 Q. -- or Diana?

11 A. She was assistant nursing director  
12 by that time, and Diana Hogan was the nursing  
13 director. So, no, they wouldn't have any  
14 reason to be walking around the unit.

15 Q. And it sounds like -- does that  
16 mean that they were on -- it sounds like you  
17 referred to it before more as administration?

18 A. Yes.

19 Q. And where did administration work  
20 in proximity to the forensic units?

21 A. So you have the -- along -- so you  
22 come into the building through security. You  
23 have to pass the security, go through security  
24 doors. Walk down a hallway. To the left was

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1 UST units. To the right was the NGRI units.

2 You would turn right, and go down a very long  
3 hallway until you got to the double doors.

4 And then the double doors opened,  
5 and each unit was on either side of the closed  
6 double doors. So about five minutes.

7 Q. So it was a little bit of a hike?

8 A. It was a hike.

9 Q. Okay. They wouldn't just kind of  
10 randomly be walking by the area?

11 A. No.

12 Q. Okay.

13 A. Administration -- you had asked me  
14 where administration was. Administration  
15 was -- so you had the lobby, and administration  
16 was to the left behind -- there was a door.  
17 And then you walked in, and we called that  
18 administration. There were offices and  
19 cubicles.

20 Q. Okay. And so then after you were  
21 let out -- I believe, drilled out of Bob  
22 Hamlin's office, what happened next?

23 A. Bob Hamlin came and said that Chief  
24 Epperson wanted to speak with me. He was the

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1           **head of security, and that he was sitting in**  
2           **the nurses' station.**

3           Q.     Okay. And did you go speak with  
4           Chief Epperson at that time?

5           A.     **Yes.**

6           Q.     And what did you two discuss?

7           A.     **He wanted to know why Ben and I**  
8           **were in the office behind the locked door.**

9           Q.     And what did you say?

10          A.     **It wasn't supposed to be locked.**

11          **It was unlocked, and it was closed, and that**  
12         **door had been malfunctioning for quite a while,**  
13         **and work orders had been put in because they**  
14         **knew it was malfunctioning, and it just**  
15         **happened to lock that day.**

16          Q.     And you've previously said that it  
17         was not an uncommon practice -- or I think it  
18         was standard practice for social workers to  
19         meet one on one with patients with the door  
20         closed, but not locked?

21          A.     **Correct.**

22          Q.     Okay. And then you told  
23         Mr. Epperson that it wasn't supposed to be  
24         locked and that was a malfunction. What did he

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1 say?

2 A. He was mad that --

3 Q. I'm sorry.

4 A. He was mad. He said things about  
5 security, and not being in the office alone  
6 with a patient and all this other stuff.

7 Q. Okay. But you had previously said  
8 that being alone in the office with a patient  
9 was not unusual?

10 A. Security didn't like that we were  
11 alone in offices with patients.

12 Q. Okay. But it still was a common  
13 practice at Elgin, they just didn't like it?

14 A. But it would not have been a common  
15 practice for me and Ben, since Ben was not my  
16 patient at that time.

17 Q. Okay. And did Mr. Epperson seem to  
18 blame you for what happened?

19 A. Yeah, I suppose since I was the  
20 social worker and should have been in control  
21 of the situation. But I told him that  
22 unbeknownst to me, that Ben just grabbed the  
23 door and shut it.

24 Q. And do you think that Mr. Epperson

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1           doubted the sincerity of what you told him  
2           about how this was an accident?

3           MR. CECALA: I'm going to make an  
4           objection again. We can't just keep having her  
5           speculate about what everyone else was  
6           thinking, whether he doubted it or not. What  
7           did he say? What did she say is perfectly  
8           fine, but I'm kind of letting it go. But she  
9           can't testify to Bob Hamlin's speculation.

10          What did he say?

11          BY MS. JOHNSTON:

12          Q. Did he tell you didn't believe you?

13          A. **No. He was mad.**

14          Q. And did he tell you what he was mad  
15        at --

16          A. **He was disgruntled.**

17          Q. Oh, go ahead.

18          A. **Disgruntled.**

19          Q. Did he tell you he was mad at you?

20          A. **Yeah. I mean, he didn't say, I'm**  
21        **mad at you, but he acted mad while we were**  
22        **talking.**

23          Q. Okay. So then after you had the  
24        incident in Mr. Hamlin's office, you said that

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1 you talked with -- or that Dr. Javed told you  
2 not to go to K Unit?

3 **A. Correct.**

4 Q. How long after the incident was  
5 that?

6 A. **The next week -- the next week. I**  
7 **think it was on a Friday because I had all**  
8 **weekend to stew and worry about what was going**  
9 **to happen on Monday.**

10 Q. And what did Dr. Javed say to you?

11 A. **That there was no reason for me to**  
12 **be going to K Unit; that Bob was going to move**  
13 **the snacks into my office; and that she did not**  
14 **want to hear about me being on K Unit at all.**

15 **She was --**

16 Q. So then the snacks that you had  
17 gone to K Unit on a mostly daily basis to get,  
18 were removed from Bob Hamlin's office?

19 A. **Correct.**

20 Q. And put in your office?

21 A. **Correct.**

22 Q. And she just told you that then you  
23 had no reason to go to K Unit anymore?

24 A. **Correct.**

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1 Q. Did she say anything else about  
2 what had happened in Mr. Hamlin's office?

3 A. **She may have alluded to the fact,**  
4 **but I don't remember her saying anything**  
5 **specific.**

6 Q. When you say "She may alluded to  
7 the fact," what does that mean?

8 A. **I would assume that it would mean**  
9 **that I didn't need to be in Bob's office with**  
10 **Ben because Ben wasn't my patient.**

11 Q. But what did she say?

12 A. **I don't remember.**

13 Q. Did she tell you that she was  
14 worried about the fact that you were in the  
15 office with Ben?

16 A. **No.**

17 Q. Did she ask if anything happened in  
18 the office with Ben?

19 A. **No.**

20 Q. Did she ask you why Ben was in the  
21 office with you?

22 A. **She may have. She may have because**  
23 **I know that at some point I would have**  
24 **explained that Ben had been my patient, and he**

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1       **wanted to tell me what was going on in his**  
2       **treatment and how he was doing, and that he**  
3       **would come in and get the box off the file**  
4       **cabinets and -- in a helpful way.**

5           Q.     But you didn't say that he was in  
6       the office because you two had any sort of  
7       sexual relationship?

8           **A.     No.**

9           Q.     And did Dr. Javed ask if you had a  
10      sexual relationship with Ben Hurt at that time?

11          **A.     No.**

12          Q.     And then had -- you already said  
13      you had that conversation then with Dr. Javed.  
14      Did you talk with anybody else outside of  
15      Dr. Javed and Mr. Epperson about the incident  
16      being locked into Bob Hamlin's office?

17          **A.     Bob and Cara.**

18          Q.     Bob and -- let's just go over, what  
19      did you say with Bob about -- when did you talk  
20      with Bob about the incident?

21          **A.     He was maybe going out to the**  
22       **parking lot or something, walking down the**  
23       **hall, walking out to the parking lot maybe.**  
24       **And he said that, yeah, that lock has been --**

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1       **that door has not been functioning, and we put**  
2       **in work orders. And it was -- it was -- it**  
3       **was -- I don't know if he said ironic or it was**  
4       **weird that it locked or something.**

5                   **I think they talked around it.**

6       **Nobody ever said anything specific.**

7       Q.     But he did tell you that the lock  
8       had been broken, and he had put in several work  
9       orders to get it fixed?

10      A.     **Yes.**

11      Q.     And so it was common knowledge to  
12       him that it wasn't working properly at least?

13      A.     **Yes. Yes. And so people were --**  
14       **and it was an accident. All of sudden he went**  
15       **to close the door, and I was freaking out**  
16       **because the door wasn't supposed to be shut**  
17       **because it was malfunctioning.**

18      Q.     And -- but I think you said that  
19       you talked about it with Cara?

20      A.     **Yeah. I was worried about -- I**  
21       **was -- what?**

22      Q.     And is that Cara Wueste?

23      A.     **Wueste.**

24      Q.     W-U-E-S-T-E, I believe?

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1           **A.     Correct.**

2           Q.     Okay. And who is she?

3           **A.     She was my friend. She was a**  
4           **social worker on the unit I worked on.**

5           Q.     On the L Unit?

6           **A.     Yes.**

7           Q.     Okay. And when did you talk with  
8           Cara about this?

9           **A.     I think coming into the facility**  
10          **the next morning or the Monday, if it was on a**  
11          **Friday. And I was talking about how I was**  
12          **worried about what was going to happen at the**  
13          **morning meeting when they talk about the**  
14          **incident, and -- and how odd it was that the**  
15          **door malfunctioned, and we got locked in.**

16          **And she was like, Christy, it will**  
17          **be okay. You just got locked in, you know, to**  
18          **a room and you didn't do it on purpose.**

19          Q.     And did you tell her anything about  
20          what happened with Ben Hurt while you were  
21          locked in the office?

22          **A.     No. Cara knew nothing.**

23          Q.     So you never discussed having any  
24          sort of nonprofessional relationship with

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1 Mr. Hurt with Cara?

2           **A. Uh-huh. No.**

3           Q. Okay. And you never discussed it  
4 with Bob Hamlin either?

5           **A. No.**

6           Q. You didn't -- did you talk about it  
7 with anybody that you worked with at Elgin?

8           **A. No.**

9           Q. And were there any other incidents  
10 that you can think of where you feel that  
11 Dr. Javed was trying to talk with you about  
12 your relationship with Ben Hurt or that was  
13 your impression?

14           **A. That -- those two times.**

15           Q. Okay. And is that all you remember  
16 about those two conversations that we have been  
17 discussing?

18           **A. Yes.**

19           Q. And I believe that you also earlier  
20 mentioned that Drew Beck said something that  
21 you perceived as related to --

22           **A. Yes.**

23           Q. -- your relationship?

24           Okay. Well, do you remember --

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1           **A. Yes.**

2           Q. -- generally speaking when that  
3         was? Was it before or after the incident in  
4         Bob's office, how about that?

5           **A. I want to say it was after, but I'm**  
6         **not sure.**

7           Q. And what did he say?

8           **A. It might have been before. I think**  
9         **it might have been before.**

10           Okay. So he came to my office, and  
11         he said that administration was watching me,  
12         and that -- I don't know if he said I needed to  
13         be careful. It was a warning about  
14         administration watching me and Ben. And that  
15         he had had conversations with administration.

16           And, see, administration talked to  
17         him like more than Bob Hamlin, who's actually  
18         the Social Worker III. Drew had connections up  
19         there because at one time he had another  
20         position up there.

21           So anyways they talked to him about  
22         my relationship with Ben, and he came to tell  
23         me that they were watching it. And I should be  
24         careful, I guess, was his intention.

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1                   And before he left, he said, "I  
2                   don't know what it is with you and black guys."

3                   And then I went to say something.  
4                   I was really caught off guard. And I have no  
5                   idea what I was going to say, but I went to say  
6                   something, and he said, "I don't want to know."  
7                   And he left.

8                   Q. And do you remember where that  
9                   conversation took place?

10                  A. In my office. Basically, people  
11                  suspected that something was going on between  
12                  myself and Ben; that there was, obviously, a  
13                  romantic relationship, but I believed that if  
14                  nobody knew it was sexual, that I was safe.

15                  I believed that people had to see  
16                  it. I thought the OIG rule -- which I was  
17                  wrong. I thought the OIG rule was that you had  
18                  to see and have evidence of to report it. And  
19                  unbeknownst to me when I researched that later,  
20                  all you needed to do was suspect a relationship  
21                  with somebody, and people suspected I had a  
22                  relationship with Ben.

23                  Q. But nobody ever told you that they  
24                  suspected?

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1                   A. Whether it was sexual or not, they  
2 should have reported it.

3 I think they did report it to  
4 protect me because everybody -- because we had  
5 relationships that -- what was your question?

Q. But nobody actually told you that  
they thought you were having a sexual  
relationship with Ben Hurt?

**9** | **A.**      **No.**

10 Q. And then you also entered into a  
11 settlement agreement with Mr. Hurt in this  
12 case, correct?

13 A. Yes.

14 MS. JOHNSTON: And actually while  
15 we do this, let's go off the record real quick.

18 BY MS. JOHNSTON:

19 Q. Ms. Lenhardt, in August of 2020,  
20 you entered into a settlement agreement with  
21 Mr. Hurt in this case; is that correct?

22 A. Yes.

23 Q. Okay. Sorry. I couldn't hear you  
24 there.

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1           **A. I'm sorry. I'm not usually a loud**  
2       **person. This is very difficult. Just like**  
3       **when I have to do it at work, I have to scream**  
4       **for people to hear me.**

5           Q. Well, I understand. And we're  
6       asking you to kind of communicate in a lot of  
7       abnormal ways with the no nonverbal  
8       communication, and the stilted way that you  
9       have to answer questions here.

10           MS. JOHNSTON: And let me just  
11       clarify, Gay, we went back on the record,  
12       correct?

13           THE STENOGRAPHER: Yes.

14           BY MS. JOHNSTON:

15           Q. Okay. So in August of 2020 you  
16       entered into a settlement agreement with  
17       Mr. Hurt. And I believe that your attorney has  
18       given you what's marked as Exhibit 3, which is  
19       the settlement agreement in that case?

20           (Exhibit No. 3 referenced.)

21           **A. Yes.**

22           Q. And I'll give you a second to take  
23       a look at it.

24           **A. Okay.**

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1 Q. I believe you heard us say earlier,  
2 so all of the attorneys, we are stipulating as  
3 to the authenticity of the settlement  
4 agreement, but feel free to take a minute to  
5 look at it, if you like, just to refresh  
6 yourself as to what it says.

7 | A. Okay.

8                   Q.     You don't have to read the whole  
9     thing word-for-word, but just so that you're  
10   comfortable.

11 A. Okay.

12 Q. And so, Christy, do you recognize  
13 this settlement agreement?

14 A. Yes.

15 Q. And as a part of this, did you also  
16 sign an affidavit and provide a signed  
17 affidavit in this case?

18 A. Yes.

19 Q. Okay. And now move on to Exhibit  
20 4, which I believe Steve also has, which is the  
21 affidavit for the Hurt case.

22 | (Exhibit No. 4 referenced.)

23 A. Yes.

Q. Okay. Do you have a copy of that

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1 there with you?

2           **A. Yes.**

3           Q. And do you recognize this as the  
4 affidavit that you signed?

5           **A. It looks like it, yes.**

6           Q. And to clarify, we have also  
7 stipulated as to the authenticity of the  
8 affidavit.

9           **A. Okay.**

10          Q. And so before you signed this  
11 affidavit, did you go over all the information  
12 that was in it with your attorney?

13          **A. Yes, I did.**

14          Q. And you understood when you signed  
15 that affidavit that you were swearing that all  
16 of the information in that affidavit was true  
17 and accurate?

18          **A. Yes.**

19          Q. And did you say, is this a -- the  
20 information that you put in that affidavit, is  
21 that a complete statement; meaning, is that all  
22 of the information that you had that you would  
23 want to put into the affidavit in this case?

24           MR. BRODY: Objection to the form

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1 of the question.

2 BY MS. JOHNSTON:

3 Q. Did you leave out information about  
4 what it is that anybody at Elgin may have known  
5 about your relationship with Ben Hurt when --

6 MR. BRODY: Same -- go ahead.

7 Finish your question.

8 BY MS. JOHNSTON:

9 Q. (Continued) -- when helping draft  
10 this affidavit?

11 MR. BRODY: Same objection. The  
12 form of the question.

13 MR. CECALA: I have the same  
14 objection. The affidavit speaks for itself.

15 THE WITNESS: I --

16 MR. CECALA: It's a sworn affidavit  
17 under oath. There's no question pending. It's  
18 a sworn affidavit under oath.

19 MR. BRODY: Here's the other  
20 problem. You're asking if she's left anything  
21 out. I don't recall -- but it's my  
22 understanding that it was not necessarily meant  
23 to be all inclusive of everything she knew or  
24 could have known or what have you.

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1                   And given the form of the question,  
2       you're asking if that's got everything. If  
3       there's something specific you think that may  
4       be missing or otherwise, please ask her.

5                   But as Joe said, the affidavit is  
6       the affidavit, and it says what it says.

7       BY MS. JOHNSTON:

8       Q.    Okay. And just going back -- we  
9       can turn back to Exhibit 3, which is the  
10      settlement agreement.

11                  And then at paragraph 1, a, iv, it  
12      states, Defendant's statement to her best  
13      recollection, summarizing each otherwise  
14      undocumented conversation she has had with  
15      co-defendants in the litigation occurring at  
16      any time subsequent to October 1, 2014,  
17      including the time and place of such  
18      conversation, which relate to any statement or  
19      assertion made in defendant's affidavit  
20      identified as Exhibit A, regarding any staff or  
21      employee of the State of Illinois, Department  
22      of Human Services, located or employed at Elgin  
23      Mental Health Center, the facility. (As read).

24                  So it appears that this affidavit

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1 was intended to kind of document any otherwise  
2 undocumented conversations that you have had  
3 with either, you know, defendants Javed,  
4 Kareemi, Delaney, Hogan or Beck?

5 MR. CECALA: I have an objection.  
6 That's actually not the language that you just  
7 read. The language speaks for itself. It's  
8 improper impeachment.

9 So to impeach her on the affidavit  
10 or the settlement agreement, you have to ask  
11 about the settlement agreement and use  
12 language. And what you just read is  
13 defendant's statement, to her best  
14 recollection, summarizing otherwise  
15 undocumented conversations. It's a summary.

16 You have the right to depose her,  
17 and ask her anything else, which is what we're  
18 doing today, but you can't --

19 MS. JOHNSTON: Did you have -- Joe,  
20 it's a speaking objection. I can go ahead  
21 and --

22 MR. CECALA: My objection.

23 BY MS. JOHNSTON:

24 Q. Do you have any --

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1                   MR. CECALA: It's improper  
2                   impeachment. I need to make the record. It's  
3                   improper impeachment. The documents speaks for  
4                   themselves, and you can't use the document to  
5                   then speculate on what the meaning of the  
6                   document is to impeach her.

7                   BY MS. JOHNSTON:

8                   Q. Are there other conversations that  
9                   were not documented -- and we'll go through the  
10                  affidavit. And what I was going to ask is, Are  
11                  there other conversations that you had that you  
12                  didn't include in this affidavit that you think  
13                  were relevant to whether or not anybody at  
14                  Elgin had knowledge about a relationship with  
15                  Ben Hurt?

16                  But let's go to the affidavit.

17                  So you have a copy of that in front  
18                  of you?

19                  A. Yes. Yes.

20                  Q. Sorry. I could hear then.

21                  So if we go to page two, there's  
22                  paragraph 10.

23                  MS. JOHNSTON: Now, given that  
24                  we're having some difficulty with the court

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1 reporter being able to hear Christy all the  
2 time, does anybody object -- because I don't  
3 think that Gay's having that difficulty with  
4 myself, and we all have a copy of this. Does  
5 anybody object if I just read some of these  
6 paragraphs in instead to help make sure that  
7 she can hear what we're saying?

8 MR. CECALA: Sure. I mean, we'll  
9 stipulate to paragraph 10.

10 MS. JOHNSTON: But I'm going to  
11 have specific questions. So we'll just make  
12 sure that we have it all in there.

13 So paragraph 10 --

14 THE WITNESS: Can you explain to  
15 where we are on this document?

16 MR. BRODY: Here. Let me  
17 (indicating).

18 MS. JOHNSTON: Sure.

19 THE WITNESS: He's going to help  
20 me.

21 MR. BRODY: She's at paragraph 10.  
22 Okay. You're talking paragraph 10 of the  
23 affidavit, correct?

24 MS. JOHNSTON: Paragraph 10 of the

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1 affidavit, yeah.

2 MR. BRODY: And that's Exhibit 4 of  
3 the affidavit. She had the wrong document.

4 MS. JOHNSTON: Oh. And does she  
5 have the affidavit in front of her now?

6 MR. BRODY: She will momentarily.

7 Paragraph 10 starts with, "Drew  
8 Beck and Hasina Javed," correct?

9 MS. JOHNSTON: Yes.

10 MR. BRODY: All right. She's got  
11 it.

12 BY MS. JOHNSTON:

13 Q. So that paragraph 10 reads, Drew  
14 Beck and Hasina Javed indicated that my  
15 relationship with Ben Hurt was overly close.  
16 Drew Beck advised me that administrators were  
17 watching me and that I needed to be careful.  
18 Hasina Javed told me that every time she came  
19 to my office, she noticed Ben Hurt in there. I  
20 believe these statements were made in an effort  
21 to tell me they suspended something about my  
22 relationship with Ben Hurt and were warnings  
23 about suspicions by superiors at the EMHC.

24 I do not believe either of them

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1 knew about any specific encounters between Ben  
2 Hurt and me, except the incident described in  
3 paragraph 18 hereof.

4                   And I will also state that  
5 paragraph 18 discusses the incident in Bob  
6 Hamlin's office, if anybody would like to look  
7 for it there to confirm as much.

8                   And so, Christy, previously we  
9 discussed a situation where Dr. Javed told you  
10 that she noticed that Ben Hurt would be in your  
11 office a lot, and then there's a -- well, is  
12 that what you're referring to in this paragraph  
13 10 here?

14                  **A. Yes.**

15                  Q. So we've already discussed that  
16 conversation in detail here today?

17                  **A. Yes.**

18                  Q. Are there any other details that  
19 you remember about that conversation that you  
20 would like to discuss now?

21                  MR. BRODY: Objection to the form  
22 of the question.

23                  Would she like to discuss -- she  
24 doesn't want to discuss any of this.

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1 BY MS. JOHNSTON:

2 Q. Fair enough.

3 Is there anything else that you  
4 remember about that conversation?

5 THE WITNESS: Can I talk to you?

6 MR. BRODY: Not while there's a  
7 question pending.

8 Is there anything else that -- she  
9 asked, is there anything else you remember  
10 about it? Yes or no. It's that simple.

11 THE WITNESS: The -- just the part  
12 about where she said I had a beautiful family.

13 BY MS. JOHNSTON:

14 Q. But you said that earlier today?

15 A. **Correct.**

16 Q. Right.

17 And outside of what's -- what we've  
18 said earlier today during this deposition, is  
19 there anything else you remember about that  
20 conversation?

21 A. **No.**

22 Q. And --

23 A. **Not that I recall. Not that I**  
24 **recall, no.**

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1 Q. And then I'm going to move to  
2 paragraph 11 now, and this is on page three, I  
3 believe.

4 But it says, Hasina Javed and other  
5 staff in general would have observed or been  
6 aware of my frequent contact with Ben Hurt in  
7 my office on Unit L. Hasina Javed and other  
8 unit staff would have observed our interactions  
9 on Unit L and should have interpreted these  
10 actions as indication that our relationship  
11 exceeded the bounds of an appropriate  
12 therapist-patient relationship. Hasina Javed  
13 may have been aware of my frequent visits to  
14 Unit K after that Ben Hurt's transfer to that  
15 unit through discussions with other staff. I  
16 visited Ben Hurt in Unit K frequently, so Drew  
17 Beck observed such visits on numerous  
18 occasions. (As read).

19 And so you state that Javed would  
20 have seen you interact with Mr. Hurt while you  
21 were on L Unit?

22 A. Yes.

23 Q. Okay. But he was your patient  
24 while you were on L Unit, correct?

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1           **A. Yes.**

2           Q. So it would be normal for you to  
3 interact with him on a regular basis?

4           **A. Not as much as we did, no.**

5           Q. But it's still normal that you  
6 would interact with him?

7           **A. Yes.**

8           Q. And Javed wasn't necessarily always  
9 there looking at exactly how often you saw  
10 Mr. Hurt. She wasn't, you know, working in the  
11 same office as you, correct?

12           **A. No. She had an office in the  
13 hallway on the unit.**

14           Q. Okay. And she also had her own  
15 patients that she would be seeing and her own  
16 workload?

17           **A. Yes.**

18           Q. And you mentioned that Dr. Javed  
19 may have known that you visited Mr. Hurt on  
20 K Unit?

21           **A. Yes.**

22           Q. And, obviously, I'm aware that  
23 there was -- after the incident in Bob Hamlin's  
24 office, she told you not to go to K Unit,

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1                   correct?

2                   **A. Yes.**

3                   Q. Do you know if she was aware of any  
4                   prior visits that you had with Mr. Hurt on  
5                   K Unit before the incident in Bob's office?

6                   **A. Not specifically, but everybody**  
7                   **knew I went to the K Unit. I mean, they could**  
8                   **see me walk down the hall.**

9                   Q. Right.

10                  And you also were going to the  
11                  K Unit to get the food for the incentive  
12                  program for the patient that you had?

13                  **A. Correct.**

14                  Q. Okay. And outside of the two  
15                  conversations that we have talked about today,  
16                  specifically, when she said that Mr. Hurt was  
17                  in your office frequently and told you -- and  
18                  then when she told you that you didn't have to  
19                  go to the K Unit, did you ever have any other  
20                  conversations with Dr. Javed about Mr. Hurt?

21                  **A. Well, sure, in terms of treatment**  
22                  **planning, yes.**

23                  Q. And I apologize. That was a bad  
24                  question.

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1                   Did you ever have conversations  
2                   with Dr. Javed about your relationship with  
3                   Mr. Hurt outside of the standard, you know,  
4                   meetings regarding his treatment?

5                   **A. Not that I can recall.**

6                   Q. And then if you want to take a look  
7                   back at -- paragraph 12 states that Hasina  
8                   Javed and Drew Beck clearly suspected an overly  
9                   close, possibly a romantic relationship between  
10                  Ben Hurt and me. This was evident by the  
11                  statements they made to me. (As read).

12                  To confirm, as it relates to  
13                  Dr. Javed, are you basing the statement made in  
14                  paragraph 12 on the two conversations that  
15                  we've discussed here today?

16                  **A. Yes.**

17                  Q. And are there any other  
18                  conversations that you would base that  
19                  statement on that we have not discussed here  
20                  today?

21                  **A. There may have been, but I don't**  
22                  **recall. Those were the two most important**  
23                  **ones.**

24                  Q. And so you say there may have been,

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1 but you don't recall?

2           **A. Yes.**

3           Q. So it's also possible that there  
4 were no other conversations?

5           **A. Yes.**

6           Q. And then let me jump down a bit to  
7 paragraph 23, which is -- well, at the top it  
8 says it's page six of 11. Do you have page  
9 six?

10                  And in paragraph 23 it says, Diana  
11 Hogan was the nursing director and Colleen  
12 Delaney was the assistant nursing director at  
13 the time of the incident in Bob Hamlin's  
14 office. They would have received a report of  
15 this incident and should have attempted to  
16 learn more about what happened. Yet, to my  
17 knowledge, they did not talk to Drew Beck, who  
18 was then Ben Hurt's therapist, or others about  
19 the incident, nor did they speak to me. (As  
20 read).

21                  Is that an accurate recitation of  
22 that paragraph?

23           **A. Yes.**

24           Q. Okay. And do you know if Colleen

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1       Delaney or Diana Hogan ever spoke with anybody  
2       about the incident in Bob Hamlin's office?

3           **A. No, I don't have knowledge of it,**  
4       **but -- I don't have knowledge of it, but I know**  
5       **that that's what would have happened. Security**  
6       **puts out this report, and it goes to everybody.**

7           Q. But you do not know what  
8       conversations, if any, they had with other  
9       people about this?

10          **A. No. They're administration. They**  
11       **would have had those conversations amongst**  
12       **themselves, not me.**

13           Q. Right.

14           So you're unable to say whether or  
15       not any of those conversations did take place?

16          **A. I am sure they did, but I can't say**  
17       **yes for sure.**

18           Q. And then in paragraph 27, which is  
19       the first full paragraph of page eight.

20          **A. Yes.**

21           Q. And if we look down -- well, I'll  
22       let you go ahead and read that paragraph again.  
23       We have stipulated to everything. But,  
24       Ms. Lenhardt, if you wouldn't mind looking at

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1       paragraph 27, specifically, the second  
2       sentence.

3                  You state that, Ben Hurt and I,  
4       meaning yourself, positioned ourselves in such  
5       manner that the sexual contact could not be  
6       seen from outside the office. (As read).

7                  **A. Yes. We were hoping that the**  
8       **sexual contact could not be seen, yes.**

9                  Q. But, again, so you were taking  
10      specific steps to try to hide what you were  
11      doing in the office?

12                 **A. Yes.**

13                 Q. And you did not want any patients  
14      or other Elgin staff to know what was going on?

15                 **A. Yes. Why would you want to?**

16                 Q. And then in paragraph 28, you say  
17      that, Some time before the spring of 2017, I  
18      was becoming concerned that EMHC staff,  
19      including Drew Beck, Hasina Javed, various  
20      security therapy aides and others, were  
21      becoming suspicious of Ben Hurt and me and that  
22      the administration would learn of our  
23      relationship. Ben Hurt and I told each other a  
24      number of times that we had to be very careful.

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1 I felt I was in danger of losing control. (As  
2 read).

3 Again, so to reiterate, you and  
4 Mr. Hurt discussed specifically being careful  
5 and not getting caught?

6 **A. Yes.**

7 Q. Okay. I went over it a few times,  
8 but at no point in time did anybody from Elgin  
9 ever tell you that they thought you were having  
10 a sexual relationship with Ben Hurt?

11 **A. No.**

12 Q. And nobody ever asked you if you  
13 were having a sexual relationship with Ben  
14 Hurt?

15 **A. No.**

16 Q. And then in paragraph 31, it  
17 says -- and this is the bottom of page nine.

18 And paragraph 31 reads that,  
19 Ultimately the sexual relationship between Ben  
20 Hurt and me was discovered through an odd  
21 coincidence. I had allowed Ben Hurt to take a  
22 picture with my cell phone. He then posted it  
23 on Instagram. Nanette Mangahas, a retired EMHC  
24 employee saw the picture and called Colleen

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1       Delaney to discuss it. Apparently, Colleen  
2       Delaney reported the matter and the  
3       administration ordered a security search of Ben  
4       Hurt's room, which turned up multiple items of  
5       digitally recorded evidence of my relationship  
6       with Ben Hurt. If not for the fortuitous  
7       discovery by Mangahas, I am sure my  
8       relationship with Ben Hurt would have remained  
9       unreported for a significantly longer period of  
10      time. (As read).

11                   So ultimately it looks like Colleen  
12          Delaney was the person who actually made the  
13          report to OIG regarding your relationship with  
14          Mr. Hurt?

15                   **A. That's what I was to understand.**  
16                   **That's what Marva, the unit -- the unit --**  
17                   **that's what Marva, the -- what is it called?**  
18                   **The union -- the union president told me.**  
19                   **There were a couple meetings where she rushed**  
20                   **me out for a meeting -- just a time when she**  
21                   **rushed me out of Elgin Mental Health Center,**  
22                   **and she told me -- she said, I'm not supposed**  
23                   **to tell you, but this is what's going on.**

24                   **Q. Okay.**

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1                   MR. CECALA: And one objection, for  
2 the record. The affidavit doesn't say that  
3 Delaney reported it to OIG. It just says, She  
4 reported it. I don't think we know who she  
5 reported it to.

6                   MS. JOHNSTON: Noted.

7 BY MS. JOHNSTON:

8                   Q. But either way, Colleen Delaney is  
9 the one who, to your knowledge, reported it to  
10 some entity or higher up?

11                  **A. Yes, that is what I understood.**

12                  Q. Okay.

13                  **A. I mean, there's gossip and...**

14                  Q. And you previously said that you  
15 and Colleen Delaney didn't have a particularly  
16 smooth relationship towards the end of your  
17 time at Elgin?

18                  **A. Yes.**

19                  Q. And I believe you said that you  
20 felt that she had a personal vendetta against  
21 you?

22                  **A. Yeah. I feel like she had some**  
23 **kind of -- this is just my professional**  
24 **opinion, from my training, that she had some**

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1 kind of -- it's a word you use when people have  
2 a -- like, that somebody reminds you of  
3 somebody else or some situation.

4 Q. I'm not sure if that's  
5 transference, but --

6 A. Yes. Counter-transference. Thank  
7 you.

8 Q. There you go.

9 A. I believe that she -- no. It's  
10 just -- she didn't like me because -- I always  
11 thought she didn't like me because I was  
12 feminine and she wasn't. She was a lesbian,  
13 and she was very masculine.

14 Q. But either way, it is your opinion  
15 that she did not like you?

16 A. Yeah. Yes.

17 Q. And you don't think that Colleen  
18 Delaney would have been going out of her way to  
19 do you many favors?

20 A. No. No, she wouldn't have been.  
21 No.

22 Q. And we've gone over a good amount  
23 of information here, and we're not necessarily  
24 quite done. I know other people have

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1       questions, too.

2                  Before I look over my notes one  
3                  last time, is there any -- have you told me  
4                  everything that you remember out of what it is  
5                  that I've asked you about? Is there anything  
6                  else that you remember?

7                  **A. My memory is not good, so yes, that**  
8                  **is all I remember.**

9                  Q.     Okay.

10                 **A. You have to understand that this**  
11                 **was traumatic for me, and I blanked out certain**  
12                 **things so that I could function. I couldn't**  
13                 **function if I kept thinking about conversations**  
14                 **where people were suspicious of me. I had to**  
15                 **keep thinking that it would be okay.**

16                 And -- and I took steps to try to  
17                 stop our sexual relationship, and Ben wouldn't  
18                 let me.

19                 MR. BRODY: You don't need to get  
20                 into a narrative about this.

21                 THE WITNESS: Okay. All right.

22                 MS. JOHNSTON: Let me go ahead, and  
23                 everybody, I just want to look over my notes  
24                 here. Can we take five minutes?

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1 MR. BRODY: Sure. Come back 12:05?

2 MS. JOHNSTON: Yes, 12:05 should  
3 work.

4 (A recess was had.)

5 MR. BRODY: We are ready.

6 MS. JOHNSTON: Okay. Back on the  
7 record.

8 BY MS. JOHNSTON:

9 Q. Ms. Lenhardt, I just have a couple  
10 last questions for you.

11 One, I believe -- so were you in a  
12 union when you were employed at Elgin?

13 A. Yes.

14 Q. What is the name of that union?

15 A. Afscme. It's letters. I think  
16 it's A-S -- I don't know -- S-C-M-E or --  
17 Afscme.

18 Q. Okay.

19 A. I'm sorry. I don't know what it  
20 stands for. Afscme. A-F-S-M-E-E or --

21 Q. Don't worry. I'm sure we'll be  
22 able to figure it out.

23 I believe you mentioned that you  
24 had a union rep that you spoke with. Do you

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1 know who that was?

2           **A. Marva Stroud, M-A-R-V-A,**  
3           **S-T-R-O-U-D.**

4           Q. And when you were at Elgin, I kind  
5 of understand the team that you worked with  
6 when you were on the L Unit, but who was your  
7 actual then supervisor as a social worker?

8           **A. Bob Hamlin.**

9           Q. And who would have been above Bob  
10 then?

11          **A. Joanne Langley.**

12          Q. And was anybody above Joanne  
13 Langley?

14          **A. The -- Jeff Pharis. Jeff Pharis**  
15 **left. I'm trying to remember who was after --**  
16 **I'm sorry. Jeff Pharis left, and he was the**  
17 **director -- the forensics director? I don't**  
18 **remember the title. And he left. And then it**  
19 **was -- all I remember is -- oh, Peggy. Peggy**  
20 **Gibble.**

21           **And for awhile it was Salvador -- I**  
22 **can't remember his last name. And then it was**  
23 **Tom-something.**

24          Q. Okay. But, generally speaking,

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1       when you were on the L Unit, your immediate  
2       supervisor was Bob Hamlin?

**A. Correct.**

4 MS. JOHNSTON: Okay. And your  
5 attorney has printed out, and Joe and Randy,  
6 you were gone for this. We're just going to  
7 pull up Exhibit 2. That's that one page  
8 e-mail.

9 (Exhibit No. 2 referenced.)

10 And I believe that Steve has a copy  
11 for you, or will be able to give you a copy.

12 MR. BRODY: She has it.

13 BY MS. JOHNSTON:

14 Q. Okay. And, Christy, you don't need  
15 to read it out loud, but can you just take a  
16 look at that e-mail.

## 17 A. I have.

18 Q. And can you confirm that if you see  
19 in purple writing about half -- or I don't  
20 know, a third of the way down the page, it  
21 says, On Thursday November 17, 2016, at 15:30.  
22 So 2:30 p.m. Christy Lenhardt from  
23 [REDACTED] Gmail.com wrote.

24 And, Christy, is that your -- or

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1 was that your e-mail address on November 17,  
2 2016?

3           **A. Yes.**

4           Q. Is that still an e-mail address  
5 that you use?

6           **A. Yes.**

7           Q. And did you write that e-mail to  
8 Ben Hurt?

9           **A. Yes.**

10          Q. And then did you send that to  
11 him -- we can all agree, you sent that to that  
12 same e-mail address that Mr. Hurt used to  
13 forward it to Mr. Kretchmar, the  
14 [REDACTED] yahoo.com?

15          **A. No. What I would do is -- no, I  
16 did not send it to his e-mail address. I would  
17 write the e-mails, put them in drafts, and then  
18 I would show them to him when we met.**

19          Q. Okay. But that is an e-mail that  
20 you wrote into a draft that you showed to Ben  
21 Hurt?

22          **A. Correct.**

23          Q. And the e-mail -- at least the  
24 draft was made on or about that November 17 --

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1           **A. How did he send it?**

2           Q. Right. How did he obtain those  
3 e-mails then?

4           MR. BRODY: Could you have sent  
5 that?

6           THE WITNESS: I could have sent  
7 that, yeah.

8           MR. BRODY: Did you send it, if you  
9 remember?

10          THE WITNESS: I don't -- I  
11 didn't -- I could have sent it. What I  
12 remember is I mostly just wrote them and didn't  
13 e-mail him because that would be damning  
14 evidence. So the thing I e-mailed to him was  
15 the stupid pictures, but he insisted that I do  
16 that.

17 BY MS. JOHNSTON:

18          Q. So at least on some occasions,  
19 though, you did e-mail him?

20          **A. Yes.**

21          Q. Okay. And this message, be it a  
22 draft or a sent message, though, was written  
23 from your e-mail address on November 17, 2016,  
24 and you wrote it?

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1           **A. Yes, I wrote it.**

2           Q. Okay. And it would have been  
3 directed to or intended for Ben Hurt to see?

4           **A. Yes.**

5           Q. Okay. And I'm going to lastly,  
6 other than what we have discussed here today,  
7 do you have any reason to believe that  
8 Dr. Javed knew that you were engaged in a  
9 sexual relationship with Ben Hurt?

10          **A. I believe she suspected, but I  
11 don't know that to be for sure.**

12          Q. And do you base that on anything  
13 other than what -- anything more than what we  
14 have discussed here today?

15          **A. Just the vibes I got from people.  
16 I was in fear that people knew.**

17          Q. Again, it was not -- did Dr. Javed  
18 ever tell you anything other than what we've  
19 discussed here today? Did she ever say  
20 anything to you that made you think that she  
21 knew or suspected you were in a sexual  
22 relationship with Ben Hurt?

23          **A. No.**

24          Q. Okay. And some general questions,

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1 other than what we have discussed here today,  
2 do you have any reason to believe that  
3 Dr. Kareemi knew that you were engaged in a  
4 sexual relationship with Ben Hurt?

5 **A. No. She even knew less than**  
6 **Dr. Javed.**

7 Q. And other than what we have  
8 discussed today -- here today, do you have any  
9 reason to believe that Colleen Delaney knew  
10 that you were engaged in a sexual relationship  
11 with Ben Hurt?

12 **A. No, not a sexual relationship.**

13 Q. And other than what we've discussed  
14 here today, do you have any reason to believe  
15 that Diana Hogan knew that you were engaged in  
16 a sexual relationship with Ben Hurt?

17 **A. No, not a sexual relationship.**

18 Q. And other than we've discussed  
19 today, do you have any reason to believe that  
20 Drew Beck knew you were engaged in a sexual  
21 relationship with Ben Hurt?

22 **A. No, not for sure.**

23 MS. JOHNSTON: And that is all that  
24 I have. I know that -- I believe that Amanda

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1 has some questions, and then Randy and Joe.

2 MS. KOZAR: Yes, I do.

3 Hi, Ms. Lenhardt. My name is  
4 Amanda Kozar, and I represent defendant Drew  
5 Beck in the Hurt lawsuit. So I just have a few  
6 additional questions that I'm going to ask you  
7 that pertains specifically to him. It  
8 shouldn't take too long.

9 DIRECT EXAMINATION

10 BY MS. KOZAR:

11 Q. So, actually, if I could just  
12 direct you back to what has previously been  
13 marked as Exhibit 4. It's to your affidavit in  
14 the Hurt case.

15 A. Got it.

16 Q. Okay. Great.

17 So if I could just direct you to  
18 paragraph 10 of that affidavit, please.

19 A. Okay.

20 Q. So the first sentence of that  
21 paragraph 10 reads, Drew Beck and Hasina Javed  
22 indicated that my relationship with Ben Hurt  
23 was overly close, correct?

24 A. Yes.

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1           Q. Okay. So talking about Drew Beck,  
2 specifically, how many times did he indicate to  
3 you that your relationship with Ben Hurt was  
4 overly close?

5           **A. Once.**

6           Q. And do you remember when that was?

7           **A. I do not remember the time, nor the**  
8 **date.**

9           Q. Okay. Was he -- were the two of  
10 you alone when he made that indication to you  
11 or were others present?

12          **A. He came to my office, and we were**  
13 **alone.**

14          Q. Okay. Do you know why he had come  
15 to your office on that particular occasion?

16          **A. He told me that administration had**  
17 **been talking to him, and that they were**  
18 **watching me and suspicious about my**  
19 **relationship with Ben or suspicious about**  
20 **something.**

21          Q. Wait. I'm sorry. So did he say  
22 specifically that administration was suspicious  
23 about your relationship with Ben, or just that  
24 they were suspicious about something?

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1           **A. No. It was Ben, because Ben had**  
2           **made that comment. So, yes, it was Ben.**

3           Q. Okay. Did he indicate why  
4           administration had been talking to him about  
5           that?

6           **A. No.**

7           Q. Okay. So what specifically did  
8           he -- no. Strike that. Let me rephrase.

9                 When he stated that administration  
10          was suspicious of your relationship with Ben  
11          Hurt, did he elaborate on that?

12           **A. No.**

13           Q. So that's the only thing he said?

14           **A. That it was, like, a warning that I**  
15          **should be careful, and -- a warning that I**  
16          **should be careful, and that -- and not a**  
17          **disagreement, but I could tell he was -- I**  
18          **could tell he was not -- disapproval. There**  
19          **was a sense of disapproval towards me.**

20           Q. Okay. Did he actually say that he  
21          disapproved of you in some way, or was that  
22          just the feeling that you got?

23           **A. That was the feeling that I got.**

24           Q. Okay. During that conversation,

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1 did he -- did he say anything to you indicating  
2 that he was aware of a sexual relationship  
3 between you and Ben Hurt?

4 **A. No.**

5 Q. Did he say anything during that  
6 conversation that indicated that he had  
7 observed a romantic or otherwise inappropriate  
8 relationship between you and Ben Hurt?

9 A. **He said to me, "I don't know what  
10 it is with you and black guys."**

11 Q. Okay. Did he say anything after he  
12 made that comment?

13 A. **No, he was leaving. And I went to  
14 answer, and he said, "No," he put up his hand,  
15 "I don't want to know."**

16 Q. Okay. Okay. All right. So aside  
17 from that incident, were there any other times  
18 that Drew Beck indicated to you in some way  
19 that he -- that your relationship with Ben Hurt  
20 was overly close?

21 A. **Not that I can recall.**

22 Q. Okay.

23 A. **I know he saw a few times when I  
24 went to the K Unit and went in Bob's office,**

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1           **and that Ben and I were talking.**

2           Q.     Okay. And so on those occasions  
3           when you went to K Unit and you Ben and were  
4           talking, did Drew Beck ever approach the two of  
5           you?

6           A.     **I don't think so, no.**

7           Q.     Okay. So do you recall him ever  
8           telling Ben Hurt to leave you alone while you  
9           were on K Unit?

10          A.     **If he did, I wasn't privy to that  
11           information or conversation.**

12          Q.     You don't remember that?

13          A.     **No. I wasn't there, if it was  
14           said, no.**

15          Q.     Okay. Okay. Let's see.

16          Do you recall whether Drew Beck was  
17          present at EMHC on the occasion that you and  
18          Ben Hurt got locked in Bob Hamlin's office?

19          A.     **I cannot completely recall. He  
20           could have been there. If it was before  
21           4:00 o'clock that I tried to leave the office,  
22           and he would have been there, if he was  
23           working, but I know there was a period of time  
24           when he was out because he had knee surgery.**

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1           And I don't know if that was the time.

2           Q.     Okay. As far as you can recall,

3               what was the date range that Drew Beck served  
4               as Ben Hurt's social worker?

5           A.     From the time he transferred  
6               until -- I know this is -- I know that -- no,  
7               no, no. When he transferred, he was Ben -- he  
8               was Bob's patient.

9               Then for some reason they  
10          transferred him from Bob to Drew. And Drew was  
11          his social worker until everything came out,  
12          and I was walked out of Elgin Mental Health  
13          Center and put on leave of absence -- not leave  
14          of absence. I'm so sorry. I was put on light  
15          duty. First, I was put on light duty. Then I  
16          was put on leave of absence.

17              I know he changed social workers  
18          because the records that were obtained by Steve  
19          and Randy that Steve Brody has, was given to  
20          me. And I read through every one of the pieces  
21          of documents, and I know that his discharge  
22          summary was written by Robert Lee.

23              So I'm going to assume that he was  
24          transferred from Drew to Robert Lee.

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1           Q. Okay. And I'm sorry. I believe  
2         you said you think that Drew Beck was his  
3         social worker until the day that you were  
4         escorted out and placed on light duty, or did I  
5         misunderstand?

6           **A. You misunderstood.**

7           **After I was walked out of the**  
8         **hospital, I didn't know anything of what was**  
9         **going on. So I would assume that he continued**  
10         **to be Drew's social worker until close to Ben's**  
11         **discharge because Ben's discharge papers were**  
12         **written by Robert Lee.**

13          Q. Okay. I understand. Thank you.

14          **A. But I don't know when Drew -- I**  
15         **don't know when Drew became not his social**  
16         **worker.**

17          Q. Okay. Okay. All right. So aside  
18         from that incident that we talked about earlier  
19         when Drew Beck came to your office to talk to  
20         you, were there any other times that we've not  
21         spoken about when Drew Beck came to you and  
22         indicated that he suspected an inappropriate  
23         relationship between you and Ben Hurt?

24          **A. Not that I can recall.**

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1 MS. KOZAR: Okay. All right.

2 Well, those are all the questions that I have.

3 So thank you, Ms. Lenhardt.

4 THE WITNESS: You're welcome.

5 MS. JOHNSTON: And, I guess, now,

6 Randy and Joe, I don't know what you have.

7 It's 12:30. Depending on that, is this a time  
8 to take a slightly longer break, or --

9 MR. CECALA: We have two questions.

10 MS. JOHNSTON: Okay. Well, then  
11 that's not necessary. Power through.

12 MR. CECALA: Yeah.

13 CROSS-EXAMINATION

14 BY MR. CECALA:

15 Q. So, Christy, I know earlier --  
16 you've testified a lot today, so I'm going to  
17 try to go back to something that was -- I'll  
18 try to refresh the testimony that you were  
19 giving, so you can kind of remember what you  
20 were saying about the consequences that  
21 occurred to you once your -- it was found out  
22 by everyone at Elgin and the police and  
23 everything that happened to you related to the  
24 incident with Ben -- or incidents with Ben, or

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1 your relationship with Ben.

2 So do you recall testifying about  
3 all those consequences earlier today?

4 **A. Yeah. To some of them, not all of  
5 them.**

6 Q. Well, one of the consequences is  
7 that the -- to engage in a romantic  
8 relationship or to go across the boundary of  
9 social worker-patient where you're romantically  
10 involved, even emotionally involved with a  
11 patient, can have serious consequences both to  
12 the professional licenses that you have and in  
13 the law as far as crimes. You understand that,  
14 right?

15 **A. Yeah, I didn't know at the time  
16 that it was illegal, and that I would be  
17 criminally prosecuted, but, yes, I know that  
18 now.**

19 Q. But you certainly understood that  
20 these relationships with -- any relationship  
21 between a social worker and a patient that was  
22 romantic, could have serious consequences, to  
23 being fired, for example?

24 **A. Yes, I knew that.**

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1           Q. Okay. So if you had admitted to  
2         someone that you were seducing a patient, that  
3         admission would be something that you could  
4         have been fired for; isn't that true?

5           **A. Yes.**

6           Q. And you understood that throughout  
7         your employment at Elgin throughout all of  
8         these circumstances; isn't that true?

9           **A. Yes. I knew that they could  
10         immediately file an OIG report, Office of  
11         Inspector General, and that I would then be  
12         investigated and fired.**

13           Q. Right.

14           And there would also potentially be  
15         consequences to people who suspected that or  
16         knew; in other words, their employment knowing  
17         about this and keeping it a secret, could put  
18         them in jeopardy of their own employment  
19         status, as well; isn't that true?

20           **A. Yes. Because you're supposed to  
21         report it to OIG.**

22           Q. Okay. I just want to make sure  
23         that I cleared this up for the record.

24           So Mary and Amanda were asking you

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1 about all these various times that someone may  
2 have talked to you or you may have suspected in  
3 the conversation that they knew something or  
4 didn't know something, and those aren't  
5 conversations where you and the other  
6 participant would have openly been saying  
7 things like, you know, I'm romantically  
8 involved with Ben, or I'm romantically involved  
9 with a patient, because the consequences were  
10 so severe, that's just not something anyone  
11 would say, correct?

12           **A. No. And no one would even -- no**  
13           **one -- like, another person would not even want**  
14           **to ask or know about it because then they would**  
15           **have to file an OIG report on me. And I was**  
16           **very well liked, and they didn't want anything**  
17           **bad to happen to me. That's why I think they**  
18           **didn't do it.**

19           Q. Okay. Good.

20                   And then just one other question.  
21                   Just to clarify this.

22                   You talked about the fact that Mark  
23                   had complained to Dr. Javed about meeting alone  
24                   in your office, and that it pertained to his

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1 Muslim or Islamic beliefs of being alone with  
2 you in the office. Do you remember talking  
3 about that?

4 **A. Yes.**

5 Q. Now, after that, you continued to  
6 be Mark's social worker, correct?

7 **A. Yes.**

8 Q. And you and Mark then met outside  
9 the office for the social work counseling  
10 sessions, correct?

11 **A. Yes.**

12 Q. And when you met, you were alone  
13 outside the office? It wasn't a shared  
14 conversation with the public. You were having  
15 a private counseling session with him; isn't  
16 that true?

17 **A. Yes.**

18 Q. So whether you were alone in the  
19 office or whether you were alone outside the  
20 office, you and Mark were still alone, correct?

21 **A. Yes.**

22 Q. Okay.

23 **A. It may have been because -- it may**  
24 **have been because the -- my office was small,**

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1 and so the -- there would be no more closeness.

2 And in the -- in the office, in the conference  
3 room, there's a large window. And it's in the  
4 dayroom where everybody walks by and sits in.

5 And so he may have felt more comfortable  
6 because --

7 Q. It was less intimate?

8 A. Yes.

9 Q. Okay. But suffice it to say, he  
10 was meeting alone with a woman both in the  
11 office and in the conference room, correct?

12 A. Yes. You make a point, yes.

13 Q. Okay. Give us one minute.

14 Okay. One last question, Christy.

15 A. Yes.

16 Q. So Dr. Javed is a woman, right?

17 A. Yes, she is.

18 Q. And to your knowledge, when  
19 patients meet with their psychiatrist, they  
20 meet alone in their office as well, don't they?

21 A. Yes. She would often meet alone in  
22 her office with patients.

23 Q. Okay. And so -- and Mark Owens was  
24 a patient of Dr. Javed, correct?

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1           **A. Correct.**

2           Q. And are you aware that he met alone  
3           with Dr. Javed in her office as a patient  
4           psychiatrist?

5           **A. Yes.**

6           MR. CECALA: Okay. That's all we  
7           have, Amanda and Mary, Sarah, Rory, Steve.

8           THE WITNESS: And Sean.

9           MR. CECALA: And Sean. Sorry.

10          MS. JOHNSTON: Steve, did you have  
11          anything you wanted to ask?

12          MR. BRODY: Who me?

13          MS. JOHNSTON: Yeah.

14          MR. BRODY: No.

15          MS. JOHNSTON: I figured as much,  
16          but, obviously, wanted to give you the  
17          opportunity.

18          MR. BRODY: Well, as usual, I got  
19          nothing.

20          MS. JOHNSTON: And I have nothing  
21          further.

22          MR. BRODY: Then that concludes us  
23          for today, doesn't it?

24          MR. CECALA: Great.

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1                   Are we going off the record?

2                   MS. JOHNSTON: Yeah, we can go off  
3                   the record now.

4                   MR. CECALA: Oh, what about  
5                   signature?

6                   MR. BRODY: We'll reserve.

7                   MR. CECALA: Okay. Great.

8                   And, Gay, we'd like a transcript  
9                   sent to us like last time.

10                  THE STENOGRAPHER: Okay.

11                  MS. JOHNSTON: And I'll be ordering  
12                  as well. And I'll send you the exhibits right  
13                  now and copy Lisa.

14                  THE STENOGRAPHER: Thank you.

15                  (The proceedings in the above  
16                  matter concluded at 12:40  
17                  p.m.)

18                  (AND FURTHER DEPONENT SAITH NOT.)

19

20

21

22

23

24

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1 IN THE UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

4 MARK OWENS, )  
5 Plaintiff, )  
6 vs. ) No. 18-cv-334  
7 HASINA JAVED, )  
8 Defendant. )

I hereby certify that I have read the foregoing transcript of my deposition given at the time and place aforesaid, consisting of pages 1 through 154, inclusive, and I do again subscribe and make oath that the same is a true, correct and complete transcript of my deposition given as aforesaid, with corrections, if any, appearing on the attached correction sheet(s).

correction sheet(s) attached.

CHRISTY LENHARDT

22 Subscribed and sworn to  
before me this \_\_\_\_ day of  
\_\_\_\_\_, A.D. 2022.

24 Notary Public

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1

2

REPORTER'S CERTIFICATE

3

4

The foregoing deposition of  
CHRISTY LENHARDT, was taken before GAY DALL, CSR,  
RPR, via videoconference, commencing at 9:15 p.m.  
on February 1, 2022.

5

That previous to the  
commencement of the examination of the witness,  
the witness was duly sworn to testify to the  
whole truth concerning the matters herein;

6

That the foregoing deposition  
transcript was reported stenographically by me,  
was thereafter reduced to typewriting under my  
personal direction, and constitutes a true record  
of the testimony given and the proceedings had;

7

That the said deposition was

8

taken before me at the time and place specified;

9

That the reading and signing by  
the witness of the deposition transcript was  
agreed upon as stated herein;

10

That I am not a relative or  
employee of attorney or counsel, nor a relative  
or employee of any such attorney or counsel for

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1 any of the parties hereto, nor interested  
2 directly in the outcome of this action.  
3  
4

5 Dated this 15th day of February, 2022.

6  
7  
8  




9 Gay Dall, CSR, RPR

10 CSR NO. 084-001169

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